

Minor Children, and as the Representative of the )  
 ESTATE OF DECEDENT DOE # 01, Deceased )  
 )  
 WIFE DOE # 02, in her own right and as the )  
 Representative of the ESTATE OF DECEDENT )  
 DOE # 02, Deceased )  
 )  
 WIFE DOE # 03, in her own right and as the Co- )  
 Representative of the ESTATE OF DECEDENT )  
 DOE # 03, Deceased )  
 )  
 WIFE DOE # 03, in her own right and as the Co- )  
 Representative of the ESTATE OF DECEDENT )  
 DOE # 03, Deceased )  
 )  
 CHILD DOE # 03, in his own right as the Son of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 CHILD DOE # 03, in his own right as the Son of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 CHILD DOE # 03, in his own right as the Son of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 CHILD DOE # 03, in his own right as the Son of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 CHILD DOE # 03, in her own right as the Daughter )  
 of DECEDENT DOE # 03, Deceased )  
 )  
 MOTHER DOE # 03, in her own right as the )  
 Mother of DECEDENT DOE # 03, Deceased )  
 )  
 BROTHER DOE # 03, in his own right as the )  
 Brother of DECEDENT DOE # 03, Deceased )  
 )  
 BROTHER DOE # 03, in his own right as the )  
 Brother of DECEDENT DOE # 03, Deceased )  
 )  
 SISTER DOE # 03, in her own right as the Sister of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 SISTER DOE # 03, in her own right as the Sister of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 SISTER DOE # 03, in her own right as the Sister of )  
 DECEDENT DOE # 03, Deceased )  
 )  
 WIFE DOE # 04, in her own right and as the )  
 Representative of the ESTATE OF DECEDENT )  
 DOE # 04, Deceased )  
 )  
 WIFE DOE # 05, in her own right as the Wife of )

**DECEDENT DOE # 05**, Deceased )  
 )  
**FATHER DOE # 05**, in his own right as the Father )  
 of **DECEDENT DOE # 05**, Deceased )  
 )  
**SISTER DOE # 05**, in her own right as the Sister of )  
**DECEDENT DOE # 05**, Deceased )  
 )  
**WIFE DOE # 06**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 06**, Deceased )  
 )  
**WIFE DOE # 07**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 07**, Deceased )  
 )  
**WIFE DOE # 08**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 08**, Deceased )  
 )  
**FATHER DOE # 08**, in his own right as the Father )  
 of **DECEDENT DOE # 08**, Deceased )  
 )  
**MOTHER DOE # 08**, in her own right as the )  
 Mother of **DECEDENT DOE # 08**, Deceased )  
 )  
**SISTER DOE # 08**, in her own right as the Sister of )  
**DECEDENT DOE # 08**, Deceased )  
 )  
**SISTER DOE # 08**, in her own right as the Sister of )  
**DECEDENT DOE # 08**, Deceased )  
 )  
**MOTHER DOE # 09**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 09**, Deceased )  
 )  
**FATHER DOE # 09**, in his own right as the Father )  
 of **DECEDENT DOE # 09**, Deceased )  
 )  
**FATHER DOE # 10**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 10**, Deceased )  
 )  
**MOTHER DOE # 10**, in her own right as the )  
 Mother of **DECEDENT DOE # 10**, Deceased )  
 )  
**WIFE DOE # 11**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 11**, Deceased )  
 )  
**FATHER DOE # 13**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 13**, Deceased )

**MOTHER DOE # 13**, in her own right as the  
 Mother of **DECEDENT DOE # 13**, Deceased  
  
**BROTHER DOE # 13**, in his own right as the  
 Brother of **DECEDENT DOE # 13**, Deceased  
  
**WIFE DOE # 14**, in her own right, on behalf of the  
 Minor Children, and as the Representative of the  
**ESTATE OF DECEDENT DOE # 14**, Deceased  
  
**MOTHER DOE # 15**, in her own right and as the  
 Co-Representative of the **ESTATE OF**  
**DECEDENT DOE # 15**, Deceased  
  
**MOTHER DOE # 15**, in her own right and as the  
 Co-Representative of the **ESTATE OF**  
**DECEDENT DOE # 15**, Deceased  
  
**FATHER DOE # 15**, in his own right as the Father  
 of **DECEDENT DOE # 15**, Deceased  
  
**FATHER DOE # 15**, in his own right as the Father  
 of **DECEDENT DOE # 15**, Deceased  
  
**BROTHER DOE # 15**, in his own right as the  
 Brother of **DECEDENT DOE # 15**, Deceased  
  
**SISTER DOE # 16**, in her own right and as the  
 Representative of the **ESTATE OF DECEDENT**  
**DOE # 16**, Deceased  
  
**SISTER DOE # 16**, in her own right as the Sister of  
**DECEDENT DOE # 16**, Deceased  
  
**MOTHER DOE # 16**, in her own right as the  
 Mother of **DECEDENT DOE # 16**, Deceased  
  
**BROTHER DOE # 16**, in his own right as the  
 Brother of **DECEDENT DOE # 16**, Deceased  
  
**WIFE DOE # 17**, in her own right and as the  
 Representative of the **ESTATE OF DECEDENT**  
**DOE # 17**, Deceased  
  
**CHILD DOE # 17**, in his own right as the Son of  
**DECEDENT DOE # 17**, Deceased  
  
**JOHN DOE # 18**, in his own right as an Injured  
 Party  
  
**JANE DOE # 19**, in her own right as an Injured  
 Party

WIFE DOE # 20, in her own right and as the  
Representative of the **ESTATE OF DECEDENT**  
DOE # 20, Deceased

WIFE DOE # 21, in her own right and as the  
Representative of the **ESTATE OF DECEDENT**  
DOE # 21, Deceased

WIFE DOE # 22, in her own right, on behalf of the  
Minor Children, and as the Representative of the  
**ESTATE OF DECEDENT DOE # 22**, Deceased

JOHN DOE # 23, in his own right as an Injured  
Party

SPOUSE DOE # 23, in her own right as the Wife of  
JOHN DOE # 23, an Injured Party

CHILD DOE # 23, in his own right as the Son of  
JOHN DOE # 23, an Injured Party

CHILD DOE # 23, in his own right as the Son of  
JOHN DOE # 23, an Injured Party

WIFE DOE # 24, in her own right and as the  
Representative of the **ESTATE OF DECEDENT**  
DOE # 24, Deceased

CHILD DOE # 24, in his own right as the Son of  
**DECEDENT DOE # 24**, Deceased

CHILD DOE # 24, in his own right as the Son of  
**DECEDENT DOE # 24**, Deceased

EX-WIFE DOE # 25, on behalf of the Minor  
Children of **DECEDENT DOE # 25**, Deceased

FATHER DOE # 26, in his own right and as the  
Representative of the **ESTATE OF DECEDENT**  
DOE # 26, Deceased

WIFE DOE # 27, in her own right and as the  
Representative of the **ESTATE OF DECEDENT**  
DOE # 27, Deceased

CHILD DOE # 27, in his own right as the Son of  
**DECEDENT DOE # 27**, Deceased

CHILD DOE # 27, in his own right as the Son of  
**DECEDENT DOE # 27**, Deceased

JANE DOE # 28, in her own right as an Injured

Party )  
 )  
**FATHER DOE # 28**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 28**, Deceased )  
 )  
**MOTHER DOE # 28**, in her own right as the )  
 Mother of **DECEDENT DOE # 28**, Deceased )  
 )  
**SISTER DOE # 28**, in her own right as the Sister of )  
**DECEDENT DOE # 28**, Deceased )  
 )  
**WIFE DOE # 29**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 29**, Deceased )  
 )  
**CHILD DOE # 29**, in his own right as the Son of )  
**DECEDENT DOE # 29**, Deceased )  
 )  
**CHILD DOE # 29**, in her own right as the Daughter )  
 of **DECEDENT DOE # 29**, Deceased )  
 )  
**CHILD DOE # 29**, in his own right as the Son of )  
**DECEDENT DOE # 29**, Deceased )  
 )  
**SISTER DOE # 30**, in her own right as the Sister of )  
**DECEDENT DOE # 30**, Deceased )  
 )  
**MOTHER DOE # 30**, in her own right as the )  
 Mother of **DECEDENT DOE # 30**, Deceased )  
 )  
**BROTHER DOE # 30**, in his own right as the )  
 Brother of **DECEDENT DOE # 30**, Deceased )  
 )  
**SISTER DOE # 30**, in her own right as the Sister of )  
**DECEDENT DOE # 30**, Deceased )  
 )  
**SISTER DOE # 31**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 31**, Deceased )  
 )  
**BROTHER DOE # 31**, in his own right as the )  
 Brother of **DECEDENT DOE # 31**, Deceased )  
 )  
**MOTHER DOE # 31**, in her own right as the )  
 Mother of **DECEDENT DOE # 31**, Deceased )  
 )  
**FATHER DOE # 32**, in his own right and as the )  
 Co-Representative of the **ESTATE OF** )  
**DECEDENT DOE # 32**, Deceased )  
 )  
**MOTHER DOE # 32**, in her own right and as the )  
 Co-Representative of the **ESTATE OF** )

**DECEDENT DOE # 32**, Deceased )  
 )  
**HUSBAND DOE # 33**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 33**, Deceased )  
 )  
**WIFE DOE # 34**, in her own right, on behalf of the )  
 Minor Children, and as the Co-Representative of the )  
**ESTATE OF DECEDENT DOE # 34**, Deceased )  
 )  
**WIFE DOE # 34**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 34**, Deceased )  
 )  
**CHILD DOE # 34**, in her own right as the Daughter )  
 of **DECEDENT DOE # 34**, Deceased )  
 )  
**SISTER DOE # 35**, in her own right as the Sister of )  
**DECEDENT DOE # 35**, Deceased )  
 )  
**SISTER DOE # 36**, in her own right as the Sister of )  
**DECEDENT DOE # 36**, Deceased )  
 )  
**SISTER DOE # 37**, in her own right as the Sister of )  
**DECEDENT DOE # 37**, Deceased )  
 )  
**HUSBAND DOE # 38**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 38**, Deceased )  
 )  
**BROTHER DOE # 39**, in his own right as the )  
 Brother of **DECEDENT DOE # 39**, Deceased )  
 )  
**FATHER DOE # 39**, in his own right as the Father )  
 of **DECEDENT DOE # 39**, Deceased )  
 )  
**MOTHER DOE # 39**, in her own right as the )  
 Mother of **DECEDENT DOE # 39**, Deceased )  
 )  
**SISTER DOE # 39**, in her own right as the Sister of )  
**DECEDENT DOE # 39**, Deceased )  
 )  
**FATHER DOE # 40**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 40**, Deceased )  
 )  
**WIFE DOE # 41**, in her own right, on behalf of the )  
 Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 41**, Deceased )  
 )  
**SISTER DOE # 41**, in her own right as the Sister of )  
**DECEDENT DOE # 41**, Deceased )  
 )

**SISTER DOE # 41**, in her own right as the Sister of )  
**DECEDENT DOE # 41**, Deceased )  
) )  
**CHILD DOE # 42**, in his own right, on behalf of )  
the Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 42**, Deceased )  
) )  
**EX-WIFE DOE # 42**, in her own right as the Ex- )  
Wife of **DECEDENT DOE # 42**, Deceased )  
) )  
**WIFE DOE # 43**, in her own right as the Wife of )  
**DECEDENT DOE # 43**, Deceased )  
) )  
**BROTHER DOE # 44**, in his own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 44**, Deceased )  
) )  
**WIFE DOE # 45**, in her own right, on behalf of the )  
Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 45**, Deceased )  
) )  
**FATHER DOE # 45**, in his own right as the Father )  
of **DECEDENT DOE # 45**, Deceased )  
) )  
**BROTHER DOE # 45**, in his own right as the )  
Brother of **DECEDENT DOE # 45**, Deceased )  
) )  
**CHILD DOE # 46**, in his own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 46**, Deceased )  
) )  
**CHILD DOE # 46**, in her own right as the Daughter )  
of **DECEDENT DOE # 46**, Deceased )  
) )  
**HUSBAND DOE # 46**, in his own right as the )  
Husband of **DECEDENT DOE # 46**, Deceased )  
) )  
**SISTER DOE # 48**, in her own right as the Sister of )  
**DECEDENT DOE # 48**, Deceased )  
) )  
**FATHER DOE # 49**, in his own right as the Father )  
of **DECEDENT DOE # 49**, Deceased )  
) )  
**WIFE DOE # 49**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 49**, Deceased )  
) )  
**SISTER DOE # 49**, in her own right as the Sister of )  
**DECEDENT DOE # 49**, Deceased )  
) )  
**WIFE DOE # 50**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 50**, Deceased )

)  
**SISTER DOE # 50**, in her own right as the Sister of )  
**DECEDENT DOE # 50**, Deceased )  
 )  
**SISTER DOE # 50**, in her own right as the Sister of )  
**DECEDENT DOE # 50**, Deceased )  
 )  
**CHILD DOE # 51**, in his own right as the Son of )  
**DECEDENT DOE # 51**, Deceased )  
 )  
**CHILD DOE # 51**, in his own right as the Son of )  
**DECEDENT DOE # 51**, Deceased )  
 )  
**BROTHER DOE # 52**, in his own right as the )  
 Brother of **DECEDENT DOE # 52**, Deceased )  
 )  
**SISTER DOE # 52**, in her own right as the Sister of )  
**DECEDENT DOE # 52**, Deceased )  
 )  
**MOTHER DOE # 52**, in her own right as the )  
 Mother of **DECEDENT DOE # 52**, Deceased )  
 )  
**WIFE DOE # 53**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 53**, Deceased )  
 )  
**FATHER DOE # 53**, in his own right as the Father )  
 of **DECEDENT DOE # 53**, Deceased )  
 )  
**MOTHER DOE # 53**, in her own right as the )  
 Mother of **DECEDENT DOE # 53**, Deceased )  
 )  
**BROTHER DOE # 53**, in his own right as the )  
 Brother of **DECEDENT DOE # 53**, Deceased )  
 )  
**FATHER DOE # 54**, in his own right as the Father )  
 of **DECEDENT DOE # 54**, Deceased )  
 )  
**MOTHER DOE # 54**, in her own right as the )  
 Mother of **DECEDENT DOE # 54**, Deceased )  
 )  
**BROTHER DOE # 54**, in his own right as the )  
 Brother of **DECEDENT DOE # 54**, Deceased )  
 )  
**BROTHER DOE # 54**, in his own right as the )  
 Brother of **DECEDENT DOE # 54**, Deceased )  
 )  
**SISTER DOE # 54**, in her own right as the Sister of )  
**DECEDENT DOE # 54**, Deceased )  
 )  
**SISTER DOE # 54**, in her own right as the Sister of )  
**DECEDENT DOE # 54**, Deceased )  
 )  
 )



**SISTER DOE # 54**, in her own right as the Sister of )  
**DECEDENT DOE # 54**, Deceased )  
) )  
**MOTHER DOE # 55**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 55**, Deceased )  
) )  
**SISTER DOE # 55**, in her own right as the Sister of )  
**DECEDENT DOE # 55**, Deceased )  
) )  
**SISTER DOE # 55**, in her own right as the Sister of )  
**DECEDENT DOE # 55**, Deceased )  
) )  
**MOTHER DOE # 56**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 56**, Deceased )  
) )  
**SISTER DOE # 56**, in her own right as the Sister of )  
**DECEDENT DOE # 56**, Deceased )  
) )  
**SISTER DOE # 56**, in her own right as the Sister of )  
**DECEDENT DOE # 56**, Deceased )  
) )  
**WIFE DOE # 58**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 58**, Deceased )  
) )  
**WIFE DOE # 59**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 59**, Deceased )  
) )  
**WIFE DOE # 60**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 60**, Deceased )  
) )  
**WIFE DOE # 61**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 61**, Deceased )  
) )  
**WIFE DOE # 62**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 62**, Deceased )  
) )  
**CHILD DOE # 63**, in her own right as the Daughter )  
of **DECEDENT DOE # 63**, Deceased )  
) )  
**CHILD DOE # 63**, in her own right as the Daughter )  
of **DECEDENT DOE # 63**, Deceased )  
) )  
**WIFE DOE # 64**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 64**, Deceased )  
) )

**HUSBAND DOE # 65**, in his own right, on behalf )  
 of the Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 65**, Deceased )  
 )  
**WIFE DOE # 66**, in her own right as the Wife of )  
**DECEDENT DOE # 66**, Deceased )  
 )  
**WIFE DOE # 67**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 67**, Deceased )  
 )  
**WIFE DOE # 68**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 68**, Deceased )  
 )  
**WIFE DOE # 68**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 68**, Deceased )  
 )  
**WIFE DOE # 69**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 69**, Deceased )  
 )  
**WIFE DOE # 69**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 69**, Deceased )  
 )  
**WIFE DOE # 70**, in her own right, on behalf of the )  
 Minor Children, and as the Co-Representative of the )  
**ESTATE OF DECEDENT DOE # 70**, Deceased )  
 )  
**WIFE DOE # 70**, in her own right and as the Co- )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 70**, Deceased )  
 )  
**WIFE DOE # 71**, in her own right, on behalf of the )  
 Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 71**, Deceased )  
 )  
**MOTHER DOE # 71**, in her own right as the )  
 Mother of **DECEDENT DOE # 71**, Deceased )  
 )  
**SISTER DOE # 71**, in her own right as the Sister of )  
**DECEDENT DOE # 71**, Deceased )  
 )  
**SISTER DOE # 71**, in her own right as the Sister of )  
**DECEDENT DOE # 71**, Deceased )  
 )  
**SISTER DOE # 71**, in her own right as the Sister of )  
**DECEDENT DOE # 71**, Deceased )  
 )  
**SISTER DOE # 71**, in her own right as the Sister of )  
**DECEDENT DOE # 71**, Deceased )  
 )

JOHN DOE # 72, in his own right as an Injured Party )  
 )  
 DOMESTIC PARTNER DOE # 73, in his own right, on behalf of the Minor Children, and as the Representative of the ESTATE OF DECEDENT DOE # 73, Deceased )  
 )  
 BROTHER DOE # 74, in his own right as the Brother of DECEDENT DOE # 74, Deceased )  
 )  
 WIFE DOE # 75, in her own right, on behalf of the Minor Children, and as the Representative of the ESTATE OF DECEDENT DOE # 75, Deceased )  
 )  
 WIFE DOE # 76, in her own right, on behalf of the Minor Child, and as the Representative of the ESTATE OF DECEDENT DOE # 76, Deceased )  
 )  
 FATHER DOE # 76, in his own right as the Father of DECEDENT DOE # 76, Deceased )  
 )  
 MOTHER DOE # 76, in her own right as the Mother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 BROTHER DOE # 76, in his own right as the Brother of DECEDENT DOE # 76, Deceased )  
 )  
 SISTER DOE # 76, in her own right as the Sister of DECEDENT DOE # 76, Deceased )  
 )  
 SISTER DOE # 76, in her own right as the Sister of DECEDENT DOE # 76, Deceased )  
 )  
 SISTER DOE # 76, in her own right as the Sister of DECEDENT DOE # 76, Deceased )  
 )

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**SISTER DOE # 76**, in her own right as the Sister of )  
**DECEDENT DOE # 76**, Deceased )  
 )  
**SISTER DOE # 76**, in her own right as the Sister of )  
**DECEDENT DOE # 76**, Deceased )  
 )  
**JANE DOE # 77**, in her own right as an Injured )  
 Party )  
 )  
**SISTER DOE # 78**, in her own right as the Sister of )  
**DECEDENT DOE # 78**, Deceased )  
 )  
**FATHER DOE # 79**, in his own right as the Father )  
 of **DECEDENT DOE # 79**, Deceased )  
 )  
**SISTER DOE # 80**, in her own right as the Sister of )  
**DECEDENT DOE # 80**, Deceased )  
 )  
**SISTER DOE # 81**, in her own right as the Sister of )  
**DECEDENT DOE # 81**, Deceased )  
 )  
**MOTHER DOE # 82**, in her own right as the )  
 Mother of **DECEDENT DOE # 82**, Deceased )  
 )  
**BROTHER DOE # 82**, in his own right as the )  
 Brother of **DECEDENT DOE # 82**, Deceased )  
 )  
**BROTHER DOE # 82**, in his own right as the )  
 Brother of **DECEDENT DOE # 82**, Deceased )  
 )  
**SISTER DOE # 82**, in her own right as the Sister of )  
**DECEDENT DOE # 82**, Deceased )  
 )  
**WIFE DOE # 83**, in her own right, on behalf of the )  
 Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 83**, Deceased )  
 )  
**WIFE DOE # 84**, in her own right, on behalf of the )  
 Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 84**, Deceased )  
 )  
**DOMESTIC PARTNER DOE # 85**, in her own )  
 right and as the Representative of the **ESTATE OF** )  
**DECEDENT DOE # 85**, Deceased )  
 )  
**HUSBAND DOE # 86**, in his own right, on behalf )  
 of the Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 86**, Deceased )  
 )  
**WIFE DOE # 87**, in her own right, on behalf of the )  
 Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 87**, Deceased )  
 )

**CHILD DOE # 87**, in his own right as the Son of )  
**DECEDENT DOE # 87**, Deceased )  
) )  
**BROTHER DOE # 87**, in his own right as the )  
Brother of **DECEDENT DOE # 87**, Deceased )  
) )  
**BROTHER DOE # 88**, in his own right as the )  
Brother of **DECEDENT DOE # 88**, Deceased )  
) )  
**WIFE DOE # 89**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 89**, Deceased )  
) )  
**WIFE DOE # 90**, in her own right, on behalf of the )  
Minor Child, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 90**, Deceased )  
) )  
**FATHER DOE # 91**, in his own right as the Father )  
of **DECEDENT DOE # 91**, Deceased )  
) )  
**MOTHER DOE # 91**, in her own right as the )  
Mother of **DECEDENT DOE # 91**, Deceased )  
) )  
**SISTER DOE # 91**, in her own right as the Sister of )  
**DECEDENT DOE # 91**, Deceased )  
) )  
**SISTER DOE # 91**, in her own right as the Sister of )  
**DECEDENT DOE # 91**, Deceased )  
) )  
**JOHN DOE # 92**, in his own right as an Injured )  
Party )  
) )  
**WIFE DOE # 93**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 93**, Deceased )  
) )  
**SISTER DOE # 93**, in her own right as the Sister of )  
**DECEDENT DOE # 93**, Deceased )  
) )  
**WIFE DOE # 94**, in her own right, on behalf of the )  
Minor Children, and as the Representative of the )  
**ESTATE OF DECEDENT DOE # 94**, Deceased )  
) )  
**WIFE DOE # 95**, in her own right as the Wife of )  
**DECEDENT DOE # 95**, Deceased )  
) )  
**WIFE DOE # 96**, in her own right and as the )  
Representative of the **ESTATE OF DECEDENT** )  
**DOE # 96**, Deceased )  
) )  
**FATHER DOE # 97**, in his own right as the Father )  
of **DECEDENT DOE # 97**, Deceased )  
) )

**MOTHER DOE # 97**, in her own right as the )  
 Mother of **DECEDENT DOE # 97**, Deceased )  
 )  
**BROTHER DOE # 97**, in his own right as the )  
 Brother of **DECEDENT DOE # 97**, Deceased )  
 )  
**SISTER DOE # 97**, in her own right as the Sister of )  
**DECEDENT DOE # 97**, Deceased )  
 )  
**SISTER DOE # 97**, in her own right as the Sister of )  
**DECEDENT DOE # 97**, Deceased )  
 )  
**SISTER DOE # 97**, in her own right as the Sister of )  
**DECEDENT DOE # 97**, Deceased )  
 )  
**SISTER DOE # 97**, in her own right as the Sister of )  
**DECEDENT DOE # 97**, Deceased )  
 )  
**SISTER DOE # 98**, in her own right as the Sister of )  
**DECEDENT DOE # 98**, Deceased )  
 )  
**WIFE DOE # 99**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 99**, Deceased )  
 )  
**WIFE DOE # 100**, in her own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 100**, Deceased )  
 )  
**JOHN DOE # 101**, in his own right as an Injured )  
 Party )  
 )  
**BROTHER DOE # 102**, in his own right as the )  
 Brother of **DECEDENT DOE # 102**, Deceased )  
 )  
**BROTHER DOE # 102**, in his own right as the )  
 Brother of **DECEDENT DOE # 102**, Deceased )  
 )  
**SISTER DOE # 102**, in her own right as the Sister )  
 of **DECEDENT DOE # 102**, Deceased )  
 )  
**SISTER DOE # 102**, in her own right as the Sister )  
 of **DECEDENT DOE # 102**, Deceased )  
 )  
**SISTER DOE # 102**, in her own right as the Sister )  
 of **DECEDENT DOE # 102**, Deceased )  
 )  
**FATHER DOE # 103**, in his own right and as the )  
 Representative of the **ESTATE OF DECEDENT** )  
**DOE # 103**, Deceased )  
 )  
**MOTHER DOE # 103**, in her own right as the )  
 Mother of **DECEDENT DOE # 103**, Deceased )  
 )

WIFE DOE # 104, in her own right and as the  
Representative of the ESTATE OF DECEDENT  
DOE # 104, Deceased  
SISTER DOE # 105, in her own right and as the  
Representative of the ESTATE OF DECEDENT  
DOE # 105, Deceased  
BROTHER DOE # 105, in his own right as the  
Brother of DECEDENT DOE # 105, Deceased  
SISTER DOE # 105, in her own right as the Sister  
of DECEDENT DOE # 105, Deceased  
SISTER DOE # 105, in her own right as the Sister  
of DECEDENT DOE # 105, Deceased  
SISTER DOE # 105, in her own right as the Sister  
of DECEDENT DOE # 105, Deceased  
SISTER DOE # 105, in her own right as the Sister  
of DECEDENT DOE # 105, Deceased  
DOMESTIC PARTNER DOE # 106, in her own  
right as the Domestic Partner of DECEDENT DOE  
# 106, Deceased  
WIFE DOE # 107, in her own right as the Wife of  
DECEDENT DOE # 107, Deceased  
FATHER DOE # 108, in his own right and as the  
Representative of the ESTATE OF DECEDENT  
DOE # 108, Deceased  
MOTHER DOE # 108, in her own right as the  
Mother of DECEDENT DOE # 108, Deceased  
SISTER DOE # 108, in her own right as the Sister  
of DECEDENT DOE # 108, Deceased  
JANE DOE # 109, in her own right as an Injured  
Party  
MOTHER DOE # 110, in her own right as the  
Mother of DECEDENT DOE # 110, Deceased  
BROTHER DOE # 110, in his own right as the  
Brother of DECEDENT DOE # 110, Deceased  
SISTER DOE # 110, in her own right as the Sister  
of DECEDENT DOE # 110, Deceased

**JANE DOE # 111**, in her own right as an Injured Party )

**BROTHER DOE # 112**, in his own right as the Brother of **DECEDENT DOE # 112**, Deceased )

**JANE DOE # 113**, in her own right as an Injured Party )

**BROTHER DOE # 114**, in his own right as the Brother of **DECEDENT DOE # 114**, Deceased )

**SPOUSE DOE # 115**, in her own right, on behalf of the Minor Child, and as Representative of the **ESTATE OF DECEDENT DOE # 115**, Deceased )

**SIBLING DOE # 116**, in his own right as the Brother of **DECEDENT DOE # 116**, Deceased )

**ADDITIONAL PLAINTIFFS 1-1000** )

**Plaintiffs,** )

**vs.** )

**AL BARAKA INVESTMENT AND DEVELOPMENT CORPORATION**, a/k/a AL BARAKA BANK, a/k/a DALLAH ALBARAKA GROUP, LLC ) ✓

**NATIONAL COMMERCIAL BANK** )

**FAISAL ISLAMIC BANK – SUDAN** )

**AL RAJHI BANKING AND INVESTMENT**, a/k/a AL RAJHI BANK )

**AL BARAKAAT EXCHANGE LLC**, a/k/a AL-BARAKAAT BANK )

**DAR AL MAAL AL ISLAMI TRUST** )

**DMI ADMINISTRATIVE SERVICES S.A.** )

**AL SHAMAL ISLAMIC BANK**, a/k/a SHAMEL BANK, a/k/a BANK EL SHAMAR )

**TADAMON ISLAMIC BANK** )

**INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**, a/k/a ISLAMIC RELIEF ORGANIZATION, a/k/a INTERNATIONAL RELIEF ORGANIZATION, a/k/a SUCCESS FOUNDATION )



FOUNDATION )  
 )  
 SUCCESS FOUNDATION, INC. )  
 )  
 MOHAMED S. OMEISH )  
 )  
 ABDURAHMAN ALAMOUDI )  
 )  
 KHALED NOURI )  
 )  
 SULAIMAN AL-ALI )  
 )  
 ABDULLAH M. AL-MAHDI )  
 )  
 TAREQ M. AL-SWAIDAN )  
 )  
 ABDUL AL-MOSLAH )  
 )  
 SALAH BADAHDH )  
 )  
 M. YAQUB MIRZA )  
 )  
 SANABEL AL KHEER, INC., a/k/a THE SANA- )  
 BELL, INC., a/k/a SANABEL AL KHAIR, a/k/a )  
 SANABIL AL-KHAIR )  
 )  
 MUSLIM WORLD LEAGUE, a/k/a RABITA AL- )  
 ALAM AL-ISLAMI, a/k/a ISLAMIC WORLD )  
 LEAGUE )  
 )  
 )  
 MUSLIM WORLD LEAGUE OFFICES )  
 )  
 ABDULLAH BIN SALEH AL-OBAID )  
 )  
 HASSAN A.A. BAHAFZALLAH )  
 )  
 YAQUB M. MIRZA )  
 )  
 SAAR FOUNDATION, a/k/a SAAR NETWORK )  
 )  
 ABU SULAYMAN )  
 )  
 AHMED TOTONJI )  
 )  
 HISHAM AL-TALIB )  
 )  
 IQBAL YUNUS )  
 )  
 JAMAL BARZINJI )  
 )  
 M. OMAR ASHRAF )  
 )

MOHAMMED JAGHLIT )  
MUHAMMAD ASHRAF )  
TAHA JABER AL-ALWANI )  
TARIK HAMDI )  
YAQUB MIRZA )  
SHERIF SEDKY )  
AFRICAN MUSLIM AGENCY )  
ARADI, INC. )  
GROVE CORPORATE, INC. )  
HERITAGE EDUCATION TRUST )  
INTERNATIONAL INSTITUTE OF )  
ISLAMIC THOUGHT )  
MAR-JAC INVESTMENTS, INC. )  
MAR-JAC POULTRY, INC. )  
MENA CORPORATION )  
RESTON INVESTMENTS, INC. )  
SAAR INTERNATIONAL )  
SAFA TRUST )  
STERLING CHARITABLE GIFT FUND )  
STERLING MANAGEMENT GROUP, INC. )  
YORK FOUNDATION )  
RABITA TRUST )  
AL-HARAMAIN ISLAMIC FOUNDATION, )  
INC., a/k/a AL-HARAMAIN ISLAMIC )  
FOUNDATION, a/k/a ISLAMIC AL-HARAMAIN )  
AL HARAMAIN FOUNDATION )  
AL HARAMAIN ISLAMIC FOUNDATION, )  
INC. )  
AQEEL ABDUL-AZEEL AL-AQEEL )

MANSOUR AL-KADI )  
)  
SOLIMAN H.S. AL-BUTHE )  
)  
PEROUZ SEDA GHATY )  
)  
BENEVOLENCE INTERNATIONAL )  
FOUNDATION, a/k/a AL BIR AL DAWALIA, )  
a/k/a AL BIR SOCIETY ORGANIZATION )  
)  
BENEVOLENCE INTERNATIONAL )  
FOUNDATION – USA )  
)  
BENEVOLENCE INTERNATIONAL )  
FOUNDATION – CANADA )  
)  
SYED SULEMAN AHMER )  
)  
ENAAM MAHMOUD ARNAOUT, a/k/a )  
ABDEL SAMIA, a/k/a ABU MAHMOUD, )  
a/k/a ABU MAHMOUD AL SURI, a/k/a ABU )  
MAHMOUD AL HAMAWI )  
)  
MAZIN M.H. BAHARETH )  
)  
SHAHIR ABDULRAOOF BATTERJEE )  
)  
MUZAFFAR KHAN )  
)  
SOLIMAN J. KHUDEIRA )  
)  
JAMAL NYRABEH )  
)  
WORLD ASSEMBLY OF MUSLIM YOUTH, )  
a/k/a WAMY INTERNATIONAL, INC., a/k/a )  
WORLD ASSOCIATION FOR MUSLIM YOUTH )  
)  
IBRAHIM S. ABDULLAH )  
)  
MOHAMMAD BIN FARIS )  
)  
DR. MAHMOUD DAKHIL )  
)  
THE GLOBAL RELIEF FOUNDATION, a/k/a )  
GRF, a/k/a FONDATION SECOURS MONDIAL, )  
a/k/a AL-NAJDA )  
)  
ABDULLAH BIN LADEN )  
)  
OSAMA BIN LADEN, a/k/a ABU ABDALLAH )  
)  
TAREK M. BIN LADEN )

SAUDI BIN LADEN GROUP, a/k/a BIN LADEN  
CORPORATION

KHALID BIN SALIM BIN MAHFOUZ

ABDULRAHMAN BIN KHALID BIN  
MAHFOUZ

SALEH ABDULLAH KAMEL

TURKI AL FAISAL AL SAUD

SULTAN BIN ABDUL AZIZ AL SAUD

SULAIMAN BIN ABDUL AZIZ AL RAJHI

SALEH ABDUL AZIZ AL RAJHI

ABDULLAH SULAIMAN AL-RAJHI

KHALID SULAIMAN AL-RAJHI

YASSIN ABDULLAH AL KADI

MOHAMMAD JAMAL AL KHALIFA a/k/a  
ABU BARAA

ADEL ABDUL JALIL BATTERJEE, a/k/a ABU  
SULafa

AQUEEL AL-AQUEEL

ABDUL RAHMAN AL SWAILEM

WA'EL HAMZA JAL Aidan, a/k/a ABU AL-  
HASSEN AL-MADANI

ABDULLAH OMAR NASEEF

THE REPUBLIC OF SUDAN

THE REPUBLIC OF SUDAN MINISTRY  
OF INTERIOR

THE REPUBLIC OF SUDAN MINISTRY  
OF DEFENSE

DELTA OIL COMPANY

NIMIR LLC

ARAB BANK, PLC

DUBAI ISLAMIC BANK )  
 )  
 BANK AL-TAQWA LIMITED )  
 )  
 AL TAQWA TRADE, PROPERTY AND )  
 INDUSTRY COMPANY LIMITED )  
 )  
 AKIDA BANK PRIVATE LIMITED )  
 )  
 AKIDA INVESTMENT CO. LTD. )  
 )  
 ASAT TRUST REG. )  
 )  
 BA TAQWA FOR COMMERCE AND )  
 REAL ESTATE COMPANY LIMITED )  
 )  
 GULF CENTER S.R.L. )  
 )  
 MIGA-MALAYSIAN SWISS )  
 )  
 GULD AND AFRICAN CHAMBER )  
 )  
 NADA INTERNATIONAL ANSTALT )  
 )  
 NADA MANAGEMENT )  
 ORGANIZATION SA )  
 )  
 NASCO BUSINESS RESIDENCE )  
 CENTER SAS DI NASREDDIN AHMED )  
 IDRIS EC )  
 )  
 NASCO NASREDDIN HOLDING A.S. )  
 )  
 NASCOSERVICE S.R.L. )  
 )  
 NASCOTEX S.A. )  
 )  
 NASREDDIN COMPANY NASCO SAS )  
 DI AHMED IDRIS NASREDDIN EC )  
 )  
 NASREDDIN FOUNDATION )  
 )  
 NASREDDIN GROUP )  
 INTERNATIONAL HOLDING )  
 LIMITED )  
 )  
 NASREDDIN INTERNATIONAL )  
 GROUP LIMITED HOLDING )  
 )  
 YOUSSEF M. NADA & CO. )  
 )  
 AHMED IDRIS NASREDDIN )  
 )

YOUSSEF M. NADA )  
SAUDI AMERICAN BANK (SAMBA) )  
TAIBAH INTERNATIONAL AID )  
ASSOCIATION )  
MERCY INTERNATIONAL RELIEF AGENCY )  
(MIRA), a/k/a MERCY INTERNATIONAL, a/k/a )  
MERCY )  
ARY GROUP )  
GLOBAL DIAMOND RESOURCES )  
ISLAMIC CULTURAL CENTER OF MILAN, )  
a/k/a CENTRO CULTURAL ISLAMICO DE )  
MILANO, a/k/a ISLAMIC CULTURAL )  
INSTITUTE OF MILAN, a/k/a ISTITUTO )  
CULTURALE ISLAMICO DE MILANO )  
ISLAMIC CULTURAL CENTER OF GENEVA )  
HANI RAMADAN )  
THE ADVICE AND REFORMATION )  
COMMITTEE (ARC) )  
THE COMMITTEE FOR THE DEFENSE OF )  
LEGITIMATE RIGHTS (CDLR) )  
GHASOUB AL ABRASH )  
KHALID SHEIK MOHAMMED )  
RAMZI BINALSHIBH )  
MUSTAF AHMED AL-HISAWI, a/k/a SHEIK )  
SAEED )  
IMAD EDDIN BARAKAT YARKAS, a/k/a ABU )  
DAHDAH )  
MUHAMMED GALEB KALAJE ZOUAYDI, )  
a/k/a ABU TALHA )  
BASSAM DALATI SATUT )  
ABDALRAHMAN ALARNAOT ABU ALJER, )  
a/k/a ABU OBED )  
MOHAMMAD KHAIR AL SAQQA, a/k/a ABU )

AL DARDA )  
 )  
 GHASOUB AL ABRASH GHALYOUN, a/k/a )  
 ABU MUSAB )  
 )  
 MOHAMMED ALI SAYED MUSHAYT )  
 )  
 ABDULLAH BIN ABDUL MUHSEN AL )  
 TURKI )  
 )  
 KHALID AL-FAWWAZ )  
 )  
 MOHAMMED HUSSEIN AL-AMOUDI )  
 )  
 ABU QATADA AL-FILISTINI, a/k/a ABU )  
 ISMAIL, a/k/a ABU UMAR, a/k/a ABU OMAR )  
 OMAR, a/k/a ABU UMR TAKFIRI, a/k/a ABU )  
 UMAR UMAR, a/k/a ALI-SAMMAN UTHMAN, )  
 a/k/a OMAR MAHMOUD UTHMAN, a/k/a UMAR )  
 UTHMAN )  
 )  
 YASSIR AL-SIRRI, a/k/a AMMAR )  
 )  
 ABDULLAH AL FAISAL BIN ABDULAZIZ AL )  
 SAUD )  
 )  
 NAIF BIN ABDULAZIZ AL SAUD )  
 )  
 MOHAMMED AL MASSARI )  
 )  
 LUJAIN AL-IMAN )  
 )  
 ZIYAD KHALEEL )  
 )  
 IBRAHIM BAH )  
 )  
 ABU ZUBAYDAH )  
 )  
 AHMED ALI JUMALE )  
 )  
 MAMDOUH MAHMUD SALIM a/k/a ABU )  
 HAJER AL IRAQI )  
 )  
 OMAR AL BAYOUMI )  
 )  
 ZACARIAS MOUSSAOUI )  
 )  
 ISLAMIC INVESTMENT COMPANY OF THE )  
 GULF (BAHRAIN) EC )  
 )  
 SAUDI HIGH COMMISSION a/k/a SAUDI )  
 HIGH RELIEF COMMISSION )  
 )

SALMAN BIN ABDULAZIZ AL SAUD )  
)  
SHEIK ABDULLAH AZZAM, a/k/a ABU )  
MUHAMMED )  
)  
ALBERT FRIEDRICH ARMAND HUBER, a/k/a )  
AHMED HUBER )  
)  
ABDULLAH SALIM BAHAMDAN )  
)  
BAKR M BIN LADEN )  
)  
OMAR M BIN LADEN )  
)  
YESLAM M BIN LADEN )  
)  
ALFAISALIAH GROUP, a/k/a AL FAISAL )  
GROUP HOLDING CO. )  
)  
HASSAN AL-TURABI )  
)  
ESSAM AL RIDI )  
)  
IBRAHIM BIN ABDULAZIZ AL IBRAHIM )  
FOUNDATION )  
)  
WADI AL AQIQ )  
)  
SOCIETY OF ISLAMIC COOPERATION, a/k/a )  
JAM'YAH TA'AWUN AL-ISLAMIA )  
)  
OMAR ABU OMAR, a/k/a ABU KUTADA )  
)  
ABU HAFS THE MAURITANIAN, a/k/a )  
MAHFOUZ OULD AL-WALID, a/k/a KHALID )  
AL-SHANQITI, a/k/a MAFOUZ WALAD AL- )  
WALID )  
)  
MOHAMED ALBANNA )  
)  
QUEEN CITY CIGARETTES AND CANDY )  
)  
AGUS BUDIMAN )  
)  
AL-BARAKA BANCORP, INC. )  
)  
AHMED RESSAM )  
)  
SAID BAHAJI )  
)  
ZAKARIYA ESSABAR )  
)  
MAMOUN DARKAZANLI )



MOHAMMED ALI HASAN AL MOAYAD )  
AL FAROOQ MOSQUE )  
YOUSSEF JAMEEL )  
IBRAHIM MUHAMMAD AFANDI )  
MOHAMMED BIN ABDULLAH AL- )  
JOMAITH )  
ABDULRAHMAN HASSAN SHARBATLY )  
SALAHUDDIN ABDULJAWAD )  
AHMED ZAKI YAMANI )  
AHMAD AL HARBI )  
MOHAMMED AL-ISSAI )  
HAMAD HUSSAINI )  
ABU RIDA AL SURI, A/K/A MOHAMED )  
LOAY BAYAZID )  
SAUDI RED CRESCENT )  
AHMED BRAHIM )  
ABU MUSAB AL-ZARQAWI )  
AYMAN AL-ZAWAHIR )  
ABU IBRAHIM AL-MASRI )  
SADDAM HUSSEIN )  
ISLAMIC ASSEMBLY OF NORTH AMERICA )  
SALMAN AL-OUDA )  
SAFAR AL-HAWALI )  
SALEH AL-HUSSAYEN )  
SAMI OMAR AL-HUSSAYEN )

MUHAMMAD J. FAKIHI )  
)  
YOUSSEF M. NADA & CO. GESELLSCHAFT )  
M.B.H. )  
)  
THE ISLAMIC REPUBLIC OF IRAN )  
)  
REPUBLIC OF IRAQ )  
)  
SYRIAN ARAB REPUBLIC )  
)  
AL QAEDA )  
)  
ASBAT AL-ANSAR )  
)  
AL GAMA'A AL-ISLAMIYYA )  
)  
EGYPTIAN ISLAMIC JIHAD )  
)  
SALAFIST GROUP FOR CALL AND )  
COMBAT )  
)  
LASHKAR I JANGHVI )  
)  
LASHKAR-E TAYYIBA )  
)  
JEMAAH ISLAMIYA ORGANIZATION )  
)  
LEBANESE HEZBOLLAH )  
)  
MUHAMMAD ATIF, a/k/a Subhi Sitta, a/k/a Abu )  
Hafs al-Masri )  
)  
SAYF AL-ADL )  
)  
SHAYKH SA'ID, a/k/a MUSTAFA )  
MUHAMMAD AHMAD )  
)  
IBN AL-SHAYKH AL-LIBI )  
)  
ABD AL-HADI AL IRAQI, a/k/a ABU )  
ABDULLAH )  
)  
THIRWAT SALAH SHIHARA, a/k/a )  
MUHAMMAD ALI )  
)  
TARIQ ANWAR AL-SAYYID AHMAD, a/k/a )  
FATHI, a/k/a AMR AL-FATIH )  
)  
MUHAMMAD SALAH, a/k/a NASR FAJIMI )  
NASR HASANAYN )  
)  
\_\_\_\_\_ )

**MAKHTAB AL-KHIDAMAT a/k/a AL-KHIFAF )**

**AL-ITIBAAD AL-ISLAMIYA (AIAI)**

**ISLAMIC ARMY OF ADEN**

**WAFI HUMANITARIAN ORGANIZATION**

**AL-RASHID TRUST**

**MAMOUN DARKAZANLI IMPORT-EXPORT  
COMPANY**

**NURJAMAN RIDUAN ISMUDDIN a/k/a  
HAMBALI**

**MOHAMMED IQBAL ABDURRAHMAN a/k/a  
ABU JIBRIL**

**BENEVOLENCE INTERNATIONAL FUND**

**BOSANSKA IDEALNA FUTURA**

**MOUNIR EL MOTASSADEQ**

**TURKISTAN ISLAMIC MOVEMENT**

**ADEL BEN SOLTANE**

**NABIL BENALTIA**

**YASSINE CHEKKOURI**

**RIADH JELASSI**

**MENDI KAMMOUN**

**SAMIR KISHK**

**TAREK BEN HABIB MAAROUFI**

**ABDELHALIM REMADNA**

**MANSOUR THSER**

**LAZHAR BEN MOHAMMED TLILI**

**HABIB WADDANI**

**THE AID ORGANIZATION OF THE ULEMA**

**ABDELKADIR MAHMOUD ES SAYED**

**ABU HAMZA AL-MASRI**

**MOHAMED BEN BELGACEM AOUADI**

**MOKHTAR BOUGHOUGH**

**TAREK CHARAABI**

**SAMI BEN KHEMAIS ESSID**

**LASED BEN HENI**

**UMMA TAMEER-E-NAU (utn)**

**BASHIR-UD-DIN MAHMOOD**

**ABDUL MAJEED**

**S.M. TUFAIL**

**AARAN MONEY WIRE SERVICE INC.**

**AL-BARAKAT BANK OF SOMALIA (BSS)**

**AL-BARAKAT FINANCE GROUP**

**AL-BARAKAT FINANCIAL HOLDING CO.**

**AL-BARAKAT GLOBAL  
TELECOMMUNICATIONS**

**AL-BARAKAT GROUP OF COMPANIES  
SOMALIA LIMITED**

**AL-BARAKAT INTERNATIONAL aka  
BARACO CO**

**AL-BARAKAT INVESTMENTS**

**AL-BARAKAT WIRING SERVICE**

**BARAKA TRADING COMPANY**

**BARAKAAT BOSTON**

**BARAKAAT CONSTRUCTION COMPANY**

**BARAKAAT ENTERPRISE**

**BARAKAAT GROUP OF COMPANIES**

**BARAKAAT INTERNATIONAL**

**BARAKAAT INTERNATIONAL  
FOUNDATION**

**BARAKAAT INTERNATIONAL, INC.**

**BARAKAAT NORTH AMERICA, INC.**

**BARAKAAT RED SEA  
TELECOMMUNICATIONS**

**BARAKAAT TELECOMMUNICATIONS CO.  
SOMALIA**

**BARAKAT BANK AND REMITTANCES**

**BARAKAT COMPUTER CONSULTING (BCC)**

**BARAKAT CONSULTING GROUP (BCG)**

**BARAKAT GLOBAL TELEPHONE  
COMPANY**

**BARAKAT INTERNATIONAL COMPANIES  
(BICO)**

**BARAKAT POST EXPRESS (BPE)**

**BARAKAT REFRESHMENT COMPANY**

**BARAKAT WIRE TRANSFER COMPANY**

**BARAKAT TELECOMMUNICATIONS  
COMPANY LIMITED (BTELCO)**

**BARAKO TRADING COMPANY, LLC**

**GLOBAL SERVICES INTERNATIONAL**

**HEYATUL ULYA**

**PARKA TRADING COMPANY**

**RED SEA BARAKAT COMPANY LIMITED**

**SOMALIA INTERNATIONAL RELIEF  
ORGANIZATION**

**SOMALIA INTERNET COMPANY**

**SOMALIA NETWORK AB**

**HUSSEIN MAHMUD ABDULLKADIR**

**ABDIRASIK ADEN**

**ABBAS ABDI ALI**

**ABDI ADULAZIZ ALI**

**YUSAF AHMED ALI**

**DAHIR UBEIDULLAHI AWEYS**

**HASSAN DAHIR AWEYS**

**GARAD JAMA**

**ALI GHALEB HIMMAT**

**LIBAN HUSSEIN**

**ABDULLAHI HUSSEIN KAHIE**

**MOHAMMED MANSOUR**

**ZEINAB MANSOUR-FARRAH**

**ABDULLAH AHMED ABDULLAH** a/k/a ABU  
MARIAM a/k/a ABU MOHAMED AL-MASRI  
a/k/a SALEH

**HAJI ABDUL MANAN AGHA** a/k/a ABD AL-  
MAN`AM SAIYID

**AL-HAMATI SWEETS BAKERIES**

**MUHAMMAD AL-HAMATI** a/k/a  
MOHAMMED HAMDY SADIQ AL-AHDAL a/k/a  
ABU ASIM AL-MAKKI

**AMIN AL-HAQ** a/k/a DR. AMIN AH HAQ a/k/a  
MUHAMMAD AMIN a/k/a DR. AMIN UL-HAQ

**SAQAR AL-SADAWI**

**AHMAD SA`ID AL-KADR** a/k/a ABU ABD AL-  
RAHMAN AL-KANADI

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**ANAS AL-LIBY** a/k/a ANAS AL-LIBI a/k/a  
NAZIM AL-RAGHIE a/k/a NAZIH ABDUL  
HAMED AL-RAGHIE a/k/a ANAS AL-SABAI

**AHMAD IBRAHIM AL-MUGHASSIL** a/k/a  
ABU OMRAN a/k/a AHMED TORAHIM AL-  
MUGHASSIL

**ABDELKARIM HUSSEIN MOHAMED AL-  
NASSER**

**AL-NUR HONEY PRESS SHOPS** a/k/a AL-NUR  
HONEY CENTER

**SA'D AL-SHARIF**

**AL-SHIFA' HONEY PRESS FOR INDUSTRY  
AND COMMERCE**

**IBRAHIM SALIH MOHAMMED AL-YACCOUB**

**AHMED MOHAMMED HAMED ALI** a/k/a  
AHMED MOHAMMED ABDUREHMAN a/k/a  
ABU FATIMA a/k/a ABU ISLAM a/k/a ABU  
KHADIJAH a/k/a AHMED HAMED a/k/a  
AHMED THE EGYPTIAN a/k/a AHMED AHMED  
a/k/a AHAMAD AL-MASRI a/k/a ABU ISLAM  
AL-SURIR a/k/a AHMED MOHAMMED ALI  
a/k/a HAMED ALI a/k/a AHMED HEMED a/k/a  
AHMED SHIEB a/k/a SHUAIB

**ALI ATWA** a/k/a AMMAR MANSOUR  
BOUSLIM a/k/a HASSAN ROSTOM SALIM

**MUHSIN MUSA MARWALLI ATWAH** a/k/a  
ABDEL RAHMAN a/k/a ABDUL RAHMAN a/k/a  
ABDUL RAHMAN AL-MUBAJIR a/k/a  
MOHAMMED K.A. AL-NAMER

**BILAL BIN MARWAN**

**AYADI CHAFIQ BIN MUHAMMAD** a/k/a BEN  
MUHAMMAD AYADI a/k/a BEN MUHAMMAD  
AYADI a/k/a BEN MUHAMMAD AYADI  
CHAFIK a/k/a BEN MUHAMMAD AYADI  
SHAFIQ

**ALI SAED BIN ALI EL-HOORIC** a/k/a ALI  
SAED BIN ALI AL-HOURI a/k/a ALI SAED BIN

ALI EL-HOURI

**MUSTAFA MOHAMED FADHIL** a/k/a ABD AL  
WAKIL AL MASRI a/k/a ABU AL-HUBI a/k/a  
HASSAN ALI a/k/a ABU ANIS a/k/a MOUSTAFA  
ALI ELBISHY a/k/a MUSTAFA MUHAMAD  
FADIL a/k/a MUSTAFA FAZUL a/k/a HUSSEIN  
a/k/a ABU JIHAD a/k/a KHALID a/k/a NU MAN  
a/k/a MUSTAFA MOHAMMED a/k/a ABU  
YUSSIR

**AHMED KHALFAN GHAILANI** a/k/a AHMED  
THE TANZANIAN a/k/a FOOPIE a/k/a FUPI a/k/a  
ABU BAKR AHMAD a/k/a A. AHMED a/k/a  
ABUBAKAR AHMED a/k/a ABUBAKAR K.  
AHMED a/k/a ABUBAKAR KHALFAN AHMED  
a/k/a ABUBAKARY K. AHMED a/k/a AHMED  
KHALFAN AHMED a/k/a AHMAD AL  
TANZANI a/k/a AHMED KHALFAN ALF a/k/a  
ABU BAKR a/k/a ABUBAKARY KHALFAN  
AHMED GHAILANI a/k/a AHMED GHAILANI  
a/k/a AHMAD KHALAFAN GHILANI a/k/a  
MUHAFUDH ABUBAKAR AHMED  
ABDALLAH HUSSEIN a/k/a ABU KHABAR  
a/k/a AHMED KHALFAN a/k/a SHARIFF OMAR  
MOHAMMED

**RIAD HIJAZI** a/k/a ABU-AHMAD AL-AMRIKI  
a/k/a ABU-AHMAD AL-HAWEN a/k/a RASHID  
AL-MAGHRIBI a/k/a ABU-AHMAD AL-SHAHID  
a/k/a M RAED HIJAZI

**HASAN IZZ-AL-DIN** a/k/a AHMED GARBAYA  
a/k/a SA-ID a/k/a SAMIR SALWWAH

**JAISH-I-MOHAMMED** a/k/a ARMY OF  
MOHAMMED

**MUFTI RASHID AHMAD LADEHYANOY**  
a/k/a MUFTI RASHEED AHMA a/k/a MUFTI  
RASHID AHMAD LUDHIANVI a/k/a MUFTI  
RASHID AHMAD WADEHYANOY

**FAZUL ABDULLAH MOHAMMED** a/k/a  
FAZUL ABDALLA a/k/a FAZUL ABDALLAH  
a/k/a ABU AISHA a/k/a ABU SEIF AL SUDANI  
a/k/a FADEL ABDALLAH MOHAMMED ALI  
a/k/a ABDALLA FAZUL a/k/a ABDALLAH  
FAZUL a/k/a ABDALLAH MOHAMMED FAZUL



a/k/a HAROON FAZUL a/k/a HARUN FAZUL  
a/k/a HAROON a/k/a FADHIL HAROUN a/k/a  
HARUN a/k/a ABU LUQMAN a/k/a FAZUL  
MOHAMMED a/k/a FAZUL ABDILAH  
MOHAMMED a/k/a FOUAD MOHAMMED a/k/a  
FADIL ABDALLAH MUHAMMAD

**FAHID MOHAMMED ALLY MSALAM** a/k/a  
USAMA AL-KIMI a/k/a FAHID MOHAMMED  
ALLY a/k/a FAHAD ALLY MSALAM a/k/a  
FAHID MOHAMMED ALI MSALAM a/k/a  
MOHAMMED ALLY MSALAM a/k/a FAHID  
MOHAMMED ALI MUSALAAM a/k/a FAHID  
MUAHAMMAD ALI SELEM

**ANSAR AL-ISLAM (AI)** a/k/a JUND AL-ISLAM

**YOUSSEF ABDAOUI** a/k/a ABU ABDULLAH  
a/k/a ABDELLAH a/k/a ABDULLAH

**MOHAMMED AMINE AKLI** a/k/a SAMIR a/k/a  
KALI SAMI a/k/a ELIAS

**MOHREZ AMDOUNI** a/k/a FABIO FUSCO a/k/a  
MOHAMMED HASSAN a/k/a TUALE ABU

**CHIEB BEN MOHAMED AYARI** a/k/a ABU  
HOBEM HICHEM

**MONDHER BAAZZOUI** a/k/a HAMZA

**LIONEL DUMONT** a/k/a BILAL a/k/a HAMZA  
a/k/a JACQUES-BROUGERE

**MOUSSA BEN AMOR ESSAADI** a/k/a DAH  
DAH a/k/a ABDELRAHMAN a/k/a BECHIR

**RACHID FEHAR** a/k/a AMINEDEL BELGIO  
a/k/a DJAFFAR

**BRAHIM BEN HEDILI HAMAMI**

**KHALIL JARRAYA** a/k/a KHALIL YARRAYA  
a/k/a AZIZ BEN NARVAN ABDEL a/k/a AMRO  
a/k/a OMAR a/k/a AMROU a/k/a AMR

**MOURNI BEN HABIB JERRAYA** a/k/a  
YARRAYA

**FOUZI IENDOUBI** a/k/a SAID a/k/a SAMIR

**NAJIB OUAZ**

**AHMED HASNI RARRBO** a/k/a ABDALLAH  
a/k/a ABDULLAH

**NEDAL SALEB** a/k/a HITEM

**ABDELGHANI MZOUZI**

**ADDITIONAL DEFENDANTS 1-1000**

**Defendants.**

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**PRELIMINARY STATEMENT**

This is an action against terrorists and the financiers of terrorism responsible for the events of September 11, 2001. It is materially identical to a prior action pending in the United States District Court for the District of Columbia captioned *Burnett et al. v. Al Baraka Inv. Co. et al.*, 02 CV 1616 (JR) (D.D.C., filed August 15, 2002). It is commenced in this Court solely as a prophylactic measure to protect 9/11 victims whose rights have been threatened by certain New York workers' compensation insurance carriers and in the event that subject matter jurisdiction is lacking in the District of Columbia action. Plaintiffs will seek to have this action placed on the suspense docket and to toll *sine die* the obligation to serve defendants under Fed. R. Civ. P. 4 (m).

**INTRODUCTION**

With the September 11, 2001 attacks on the United States, the threat of international terrorism has become a daily fact of life for every American. The ongoing menace of international terrorism and mass murder has been permanently lodged in the psyche of every civilized person. This new reality calls for action. In response to these acts of barbarism, Plaintiffs herein respond with the collective voice of civilization, and ask for justice under the rule of law.

It is the tradition of a civilized nation to allow redress for wrongs through an appeal to the rule of law and justice. Law is at the foundation of civilization, thus it is particularly fitting that the rule of law respond to attacks of terrorism and savagery. For it is the rule of law and liberty that separate civilization from the barbarism and anarchy extolled by international terrorism. The rule of law is a powerful weapon to be drawn upon in difficult times and to be forged in defense of justice. The United States system of justice, the American people, and the world as a whole have faced enemies more powerful than these terrorists and their sponsors, and will do so again. In taking this action, Plaintiffs herein invoke the rule of law to hold those who promoted, financed, sponsored, or otherwise materially supported the acts of the barbarism and terror inflicted on September 11, 2001 accountable for their deeds. By taking vigorous legal action against the financial sponsors of terror, the Plaintiffs will force these sponsors of terror into the light and subject them to the rule of law.

This civil action seeks to hold those responsible for a more subtle and insidious form of terrorism, that which attempts to hide behind the facade of legitimacy. These entities, cloaked in a thin veil of legitimacy, were and are the true enablers of terrorism. The financial resources and support network of these Defendants – charities, banks, front organizations and financiers – are what allowed the attacks of September 11, 2001 to occur. Terrorists like Osama bin Laden and his al Qaeda network do not exist in a vacuum. They cannot plan, train and act on a massive scale without significant financial power, coordination and backing. Defendants herein, some of whom act in the shadows, are ultimately responsible for the damages caused by the actions of their terrorist agents and clients.

On September 20, 2001, President George W. Bush addressed a joint session of Congress and made clear the Nation will fight the war on terrorism on all available fronts. The lines drawn on that day were diplomatic, military, political, legal and financial. The war against terrorism is very personal to the Plaintiffs herein. The United States' Congress responded to the call to war

by fashioning the Patriot Act of 2001, which strengthens law enforcement's ability to track down terrorists and reaffirms the principles underlying the prior legal rights of individual citizens to pursue justice and punishment against the perpetrators of terror. *Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism, (The USA Patriot Act, Title X, 2001)*. The Patriot Act itself was the culmination of decades of precedent setting judicial decisions and statutory enactments that gave individuals enlarged rights to seek redress and compensation for damages from the sponsors of terrorism. When viewed as a whole, these executive, legislative and judicial actions vastly empower the families herein to seek, win and enforce justice. As one United States court recently noted, "[t]he only way to imperil the flow of money and discourage the financing of terrorist acts is to impose liability on those who knowingly and intentionally supply the funds to the persons who commit the violent acts." *Boim v. Quranic Literacy Institute, et al.*, 291 F.3d 1000 (7<sup>th</sup> Cir. 2002).

Plaintiffs herein assert statutory and federal common law claims as available to victims' surviving spouses, children, siblings, parents, and legal representatives. Claims herein are brought pursuant to the Foreign Sovereign Immunities Act 28 U.S.C. § 1605(a)(2); § 1605(a)(5); and § 1605 (a)(7) with Pub. L. 104-208, Div. A, Title I, § 1605 note (West Supp.)(Flatow Amendment); Torture Victim Protection Act, Pub. La. 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. § 1350 note (West 1993); Alien Tort Claim Act, 28 U.S.C. § 1350; and the anti-terrorism provisions of 18 U.S.C. § 2333, *et. seq.*, and related federal common law claims. This Complaint includes claims brought by both United States citizens and foreign nationals. Congress' enactment of the terrorist-related statutes set forth herein evidences legislative intent for accountability and provides these victims a forum for that accountability. In addition to

accountability and compensation, these legal statutes can also be used to punish and deter future acts of terrorism.<sup>1</sup>

The USA Patriot Act of 2001 was enacted to “deter and punish terrorist acts in the United States and around the world, to enhance law enforcement investigatory tools, and for other purposes.” USA Patriot Act of 2001, Title X, § 1001. Congress, by enacting the USA Patriot Act, reinforced this legislative intention to enable victims the ability to deter and punish terrorists acts in the United States and around the world. The Patriot Act makes this message clear:

All Americans are united in condemning, in the strongest possible terms, the terrorists who planned and carried out the attacks against the United States on September 11, 2001, and in pursuing all those responsible for those attacks and their sponsors until they are brought to justice.

USA Patriot Act of 2001, Title X, § 1002.

International terrorism is closely related to genocide, differing only in scope. The same legal rationale for holding responsible the industrialists and bankers of Nazi Germany that facilitated the genocide of the holocaust apply to financiers and perpetrators of international terrorism responsible for September 11, 2001. Although this is a civil action for damages that draws upon specific United States statutory enactments aimed at civil remedies for international terrorism (as opposed to a criminal complaint), it nevertheless draws upon the historic precedent and legacy of the Nuremberg Industrialists cases. *See e.g. Trials of War Criminals before Nuremberg Military Tribunals Under Control Council Law #10, Nuremberg, October 1946 - April 1949; Washington D.C.: GPO, 1949-1953; National Archives Record Group 238, M887.* Those cases make clear that responsibility for genocide, and by implication the contemporary

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<sup>1</sup> Moreover, the Victim's Compensation Fund is not a bar to terrorist suits. Kenneth Feinberg, Special Master for the Victim's Compensation Fund has stated publicly that Nations harboring terrorists, or promoting terrorism, can be sued by those who participate in the Fund. The Department of Justice, Office of Attorney General has also reiterated victims' rights to pursue actions against terrorists: A claimant who files for compensation waives any right to file a civil action (or to be a party to an action) in any federal or state court for damages sustained as a result of the terrorist-related aircraft crashes of September 11, 2001, *except for actions to recover collateral source obligations or civil actions against any person who is a knowing participant in any conspiracy to hijack any aircraft or to commit any terrorist act.*

offshoot – international terrorism – rests not only with those who pull the trigger, or plant the bomb, or man the airplanes, but with those who facilitated those events through financial or other material means.

In the wake of September 11, 2001, the United Nations Security Council unanimously held that all Nations should act to prevent and suppress the financing or support of terrorism, as well as criminalize the willful provision or collection of funds for such acts. *U.N. Security Council Resolution 1373 (2001)*. The United Nations further resolved that the funds, financial assets and economic resources of those who commit, attempt to commit, participate in, or facilitate the commission of terrorist acts, including persons and entities that act on behalf of terrorists, should also be frozen without delay. *U.N. Security Council Resolution 1373 (2001)*. It is in the spirit of this international consensus of condemnation that Plaintiffs bring this action.

The armed forces of the United States have won an initial victory, in what promises to be a long war on terrorism. The victims and families of the September 11, 2001 attacks should also be able to play their part against those enemies that hide behind the cloak of legitimacy. The monetary lifeblood of the Defendants must be redirected to the ends of religious and political tolerance rather than be allowed to continue to sponsor and foster international terrorism and butchery. The United States civil justice system is a necessary and important part of this endeavor.

Osama bin Laden and his sponsors, promoters, financiers, co-conspirators, aiders and abettors in the September 11, 2001 terrorist acts are fundamentally rooted in what the overwhelming majority of Islamic thinkers consider to be an illegitimate perversion of Islam. The charitable, financial, religious, and political networks that front terror – the Defendant banks, charities, financial and business institutions – are responsible for the death and injuries of September 11, 2001. These Defendants, who aided, abetted, sponsored, conspired to sponsor,

financed or otherwise provided material support to Osama bin Laden, al Qaeda, and international terrorism must be held accountable.

Al Qaeda differs from traditional state-sponsored terrorist groups in a critical way: it is financially robust. As a 2002 independent commission on financing of international terrorism reported:

Building al Qaeda's financial support network was Osama bin Laden's foremost accomplishment, and the primary source of his personal influence. Unlike other terrorist leaders, he was not a military hero, nor a religious authority, nor an obvious representative of the downtrodden and disillusioned. He was a rich financier, both a scion of one of Saudi Arabia's most influential families and a challenger to Saudi Arabia's existing system of governance, distinguished by his ability to organize an effective network.

Al Qaeda's financial network continues to support the organization today, even after being driven from its Afghan base, and allows it to maintain its capacity to attack Americans at home and abroad. As long as al Qaeda retains access to a viable financial network, it remains a lethal threat to the United States.

Organizationally, al Qaeda is notably and deliberately decentralized, compartmentalized, flexible and diverse in its methods and targets. The same description applies to its financial network. If al Qaeda were financed only by Osama bin Laden's personal inheritance, or only by a small number of state sponsors, and if it were only limited in scope to a small area of the globe, or weren't continuously replenishing its coffers, the problem would be much easier to solve.

Instead, al Qaeda's financial network is characterized by layers and redundancies. It raises money from a variety of sources and moves money in a variety of manners.

Al Qaeda has operated under a cloak of legitimacy – running legitimate businesses, such as the network of corporations Osama bin Laden created when he lived in Sudan, or the honey traders in Yemen that the U.S. government has now publicly identified as being a part of al Qaeda's financial network. Profits earned from these legitimate businesses are then channeled to terrorist ends. Al Qaeda also earns money from a wide range of criminal enterprises.

However, the most important source of al Qaeda's money is its continuous fundraising efforts. Al Qaeda's financial backbone was built from the foundation of charities, nongovernmental organizations, mosques, web

sites, fundraisers, intermediaries, facilitators and banks and other financial institutions that help finance the *mujahideen* throughout the 1980s.

In many communities, the *zakat* is often provided in cash to prominent, trusted community leaders or institutions, who then commingle and disperse donated moneys to persons and charities they determine to be worthy. These widely unregulated, seldom audited, and generally undocumented practices have allowed unscrupulous actors such as al Qaeda to access huge sums of money over the years.

Today al Qaeda continues to raise funds from both direct solicitations of wealthy supporters and through retail charities. Some, whose donations go to al Qaeda, know full well the terrorist purposes to which their money will be put.

Once raised in the manners described, al Qaeda's money is moved through a similarly diverse set of mechanisms. The first, and most simple, is the ubiquitous and highly efficient global financial system, including the interconnected network of banks and other financial institutions that undergird the global economy. For years, al Qaeda has been particularly attracted to operating in under-regulated jurisdictions, places with limited bank supervision, no anti-money laundering laws, ineffective law enforcement institutions, and a culture of no-questions-asked bank secrecy.

But al Qaeda did not limit itself to regional money centers; it also took advantage of the globalizing financial system to move its money through banks in virtually every corner of the world, including offshore jurisdictions long known for providing bank secrecy. For instance, in the case of al-Taqwa (a purported international financial services company now the subject of U.S. and international sanctions), al Qaeda moved its funds through accounts in such familiar havens as Liechtenstein and the Bahamas. And the United States has not been immune from al Qaeda money flows: We have all seen the video of Mohammed Atta withdrawing funds from an ATM in South Portland, Maine, on September 10, 2001: funds that were transferred from accounts run by a senior al Qaeda operative, Khalid Sheik Mohammed, in the United Arab Emirates.

Al Qaeda also abuses the Islamic banking system, an entirely legitimate form of investment and finance that abides by *sharia*, or Islamic law, which prohibits the earning or payment of interest. Many prominent Islamic banks operate under loose regulatory oversight, in part because they are based in jurisdictions without proper controls, but also because their religious nature often allows them a greater degree of autonomy owing to obvious domestic considerations. Islamic banks regularly commingle funds from depositors to place them within group investments by fund managers, creating ready opportunities for anonymous money transfers and settlement. Moreover, al Qaeda and other terrorist groups



that use Islam to justify their activities are also more likely to find willing collaborators within the Islamic banking system.

*Terrorism Financing, Report of an Independent Task Force Sponsored by the Council on Foreign Relations, 2002.*

The Report concluded that individuals and charities in Saudi Arabia have been “the most important source” of funds for al Qaeda, and that Saudi officials have “turned a blind eye” to this fact. Clearly, the actions of certain members of Saudi Arabian society and the Saudi Royal family are implicated in the September 11, 2001 attacks and are directly at issue in this case. Osama bin Laden is a naturalized Saudi Arabian whose family still has close ties to the inner circles of the monarchy. Royal denials notwithstanding, Saudi money has for years been funneled to encourage radical anti-Americanism as well as to fund the al Qaeda terrorists. Saudi Arabian money has financed international terrorism while its citizens have promoted and executed it. It is no coincidence that immediately following the September 11, 2001 attacks, members of the bin Laden family were whisked away from the United States to Saudi Arabia, at a time when commercial aviation was shut down in the United States.

Cash infusions from Saudi Arabia to front groups across the world works to ensure that perverse religious extremism takes hold internationally and in the United States. According to a briefing presented July 10, 2002 to the Defense Policy Board, a group of prominent intellectuals and former senior officials that advises the Department of Defense on policy: “The Saudis are active at every level of the terror chain, from planners to financiers, from cadre to foot-soldier, from ideologist to cheerleader.” *Rand Corporation, Defense Policy Board briefing, July 10, 2002.* Certain entities and individuals in Saudi Arabia promote a culture of violence through the sponsorship of Osama bin Laden, al Qaeda and international terrorism. This culture of violence is also promoted through religious influence.

The Saudis are subjected to religious policing by the religious establishment which is dominated by descendants of Mohammed bin Abdul Wahhab. These religious police, the

Committee for the Propagation of Virtue and the Prevention of Vice, exert strict and repressive control over the education system, and every aspect of social and personal behaviour. During the five daily prayers, religious police order shops and businesses to close, while in the mosques clerics rail against non-Muslims, the schools teach hatred, and the Ministry of Islamic Affairs publishes books describing Judaism and Christianity as deviant. The clerics dominate Saudi society, and anyone who talks of democracy, human rights or religious tolerance is put in jail or persecuted. This culture, which promotes hatred, religious intolerance and violence, is the prime enabler of al Qaeda and the growth of international terrorism. Ironically, the Defendants herein are the facilitators of international terrorism who use modern means and the "western" system while trying to destroy them.

A manifesto recently turned over by a captured al Qaeda member is one of the most virulent anti-American tirades appearing to date. The author's name is obviously a pseudonym: Salahuddin Ayyubi, known in the west as Saladin the Kurdish Sultan who reconquered Jerusalem from the crusaders in 1199. The pseudonym however is inaccurate, because Saladin was a soldier of honor embodying true Islamic beliefs and tolerance, unlike the cowardly, twisted and dishonorable murderers of innocents who penned this document. (In the back of the manifesto, there is a claim that it was authored by Osama bin Laden.)

The manifesto discusses the lawfulness from an Islamist point of view of committing acts of terror against Americans and declares that it is legitimate to kill every person, including women and children, and to burn all that can be burned. This genocidal literature tries to legitimize biological and chemical warfare in the service of terrorism, including using nuclear weapons such as a dirty bomb. Terrorism is justified with pseudo-religious arguments, giving historical examples in abundance and richly, if inaccurately, citing to Islamic preachers and teachers of centuries past. Excerpts from the al Qaeda manifesto include:

I say that all the nations of the world have to be looked at concerning their attitude towards Muslims. They are either countries of war, countries with which we are at war, or treaty partners. The basis on which an infidel state rests is that it is inimical and prepared to wage war against us which makes it lawful to fight it by all means necessary.

The prophet also legitimized that a nation such as America is a state at war with us and not a treaty partner and killing of women and the old and children of the war states, when they could not easily be differentiated, is permissible, and it was not possible to get hold of the military personnel, except by killing them [the civilians].

If an infidel is not a treaty partner and not someone to whom Muslim protection is due, then he is in reality a person of war, an enemy to be fought. And it is lawful to shed his blood . . .

Once an infidel is a person of war, killing him is lawful. There is consensus among Muslims today that America has never been a land of Islam and will never be a treaty partner of Muslims. If we accept that she was a treaty partner, those treaties were bipartisan and today it no longer abides by those agreements.

*(From The Truth About the New Crusade By the Vanquisher of the Crusaders)*

The perverse reading of Islam, which purports to justify the evil acts of al Qaeda, are outrageous and chilling to any civilized person:

We have not reached parity with them yet. We have the right to kill four million Americans-two million of them children-and to exile twice as many and wound and cripple hundreds of thousands. Furthermore, it is our right to fight them with chemical and biological weapons. America is kept at bay by blood alone. . .

Al Qaeda spokesman Suleiman Abu Gheith, June 12, 2002.

### **A Short History of al Qaeda**

In or around 1989, Osama bin Laden formed al Qaeda, which means “the Base” or “the Vanguard” in Arabic, into an international terrorist group with the aim of opposing non-Islamic governments with violence. Included in Osama bin Laden’s founding vision of al Qaeda was the overthrow of Islamic states that were considered to be too secular, or too beholden to the West. Another goal of al Qaeda was to drive the American armed forces out of the Saudi Arabian peninsula and Somalia. The al Qaeda organization brought together a large number of Arab fighters that had fought in Afghanistan against the Soviet Union. Up to five thousand Saudis, three thousand Yemenis, two thousand Algerians, two thousand Egyptians, four hundred Tunisians, three hundred Iraqis, two hundred Libyans, and numerous Jordanians served alongside the Afghans in attempting to oust the Soviets during the 1980s.

Osama bin Laden went to Afghanistan just after the Soviet invasion in 1979. He became a prime financier, recruiter, and military leader of the Mujahedeen groups. He advertised all over the Arab world for young Muslims to come fight in Afghanistan against the Soviets. He set up recruiting offices all over the world, including in the United States and Europe. These recruiting offices were often run under the auspices of charities which were taking donations from wealthy Saudi families and businessmen. These charities operated in the United States, Europe, Asia, Africa, and the Middle East in furtherance of international terrorism. Charities became an essential part of the support system of al Qaeda and Osama bin Laden, providing the financial resources that enabled them to wage war. The Saudi charitable institutions raised these funds in part through a system of Islamic tithing known as zakat. Zakat, as one of the pillars of Islam, calls for faithful Muslims to give a specified percentage of certain wealth to needy people. Cash funds held in possession for one year require a two and a half percent zakat payment, typically to a charity. The charity is entrusted with managing the donations. However, the charitable practice of the zakat was perverted by Osama bin Laden as his radical terrorist organization

expanded. The financial and logistical support given to al Qaeda by the Defendants funded al Qaeda growth siphoning off charitable donations to sponsor terrorism.

Osama bin Laden paid for the transportation of the new recruits to Afghanistan with some of his personal fortune, and set up camps there to train them. Osama bin Laden brought in experts from all over the world on guerilla warfare, sabotage, and covert operations to train and lead the recruits. Within a little over a year, he had thousands of volunteers in training in his private military camps. After the withdrawal of the Soviets in 1989, these politically and religiously radical and militaristic warriors spread out over the world to their countries of origin. Steeped in a bloody perversion of the concept of Jihad for many years, these individuals were indoctrinated to the point they were not inclined to let go of the militant life they had grown accustomed to during the war. Many took up the radical Islamic cause in their home countries with the aim of destabilizing and overthrowing the more moderate Arab regimes, for not enforcing a "pure" form of Islam.

For example, one thousand of Osama bin Laden's faithfuls returned to Algeria where they began a nine-year civil war. Those returning to Egypt joined the al-Gama'a al-Islamiyya and the Egyptian Jihad groups determined to overthrow the government of that country. As many as two hundred of Osama bin Laden's followers settled in New York and New Jersey within the United States; some of these were later implicated in terrorist plots such as the 1993 World Trade Center bombing.<sup>2</sup> When Pakistan cracked down on al Qaeda members, many of them fled to Asia and joined radical Islamic groups in the Philippines. Some returned to Central Asia to continue the fight against the Russians in Tajikistan, or to other areas such as Bosnia and Chechnya where Muslims were embroiled in conflicts. By this time, Osama bin Laden's funding and support network was in place, and served as a template for the creation and growth of the al

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<sup>2</sup> An admitted al Qaeda operative Ramzi Yousef was convicted on murder and conspiracy charges for his role in the plot to topple the trade center's two 110-story towers to punish the United States for its support of Israel.

Qaeda network. Osama bin Laden simply tapped into the same network formed through his Mujahedeen connections and incorporated those militant individuals and groups under the umbrella title al Qaeda in expanding the base of international terrorism.

In 1991, Osama bin Laden moved to Khartoum, the capital the Republic of Sudan. Here he continued to recruit former fundamentalist warriors into the ranks of al Qaeda and offer them support. In addition to seasoned recruits, new volunteers to his radical cause were given military training and sponsorship in training camps set up there. Soon he had set up Sudanese factories, farms and projects established for the purpose of supplying jobs to those he had recruited. Osama bin Laden built roads and other infrastructure for the Sudanese government with his construction company, al-Hijrah Construction and Development Ltd., and with the support of the Saudi Binladin Group. Osama bin Laden's and the Saudi Binladin Group's money built the airport at Port Sudan, as well as a major highway linking Khartoum to Port Sudan. These projects helped to establish and strengthen Osama bin Laden's relationship with the Sudanese regime. His import-export firm, Wadi al Aqiq, began doing brisk business. Osama bin Laden's Taba Investment Company Ltd. flourished while his agriculture company bought up huge plots of land. The Al Shamal Islamic Bank (or "Al Shamal Bank"), in which Osama bin Laden invested \$50 million, helped finance these thriving companies, as well as overall support for the growing al Qaeda presence within the Republic of Sudan.

Over the next five years, terrorist training activities and recruitment fueled by these economic developments continued, while Osama bin Laden lived in Khartoum under the protection of the Sudanese regime. In 1996, the Sudanese government bowed to pressure from the United States and requested that Osama bin Laden leave the country. Osama bin Laden was allowed to move back to Afghanistan as an honored guest of the Taliban. For the next five years, with the funding, sponsorship, aiding and abetting of the Defendants herein, Osama bin Laden

continued to expand the terrorist training camps that filled the ranks of al Qaeda, and served as bases from which to plan international terrorist attacks.

Al Qaeda members have engaged in a pattern of conduct in planning international terrorist attacks over the past fifteen years. The first such attack was against the United Nations forces in Somalia on October 3 and 4 of 1993, in which eighteen American servicemen were killed and seventy-eight wounded. Osama bin Laden and al Qaeda members also plotted the terrorist bombing of the World Trade Center in 1993, and a plan in 1995 (Project Bojinka) to blow up twelve American airliners simultaneously. The backup plan for Project Bojinka was to hijack planes and use them as missiles against prominent American landmarks such as the World Trade Center, the White House, and the CIA headquarters in Langley, Virginia.

Al Qaeda was also behind the Khobar Towers bombing in Riyadh, Saudi Arabia, in which nineteen American servicemen were killed in November of 1995. After the Khobar attack, inside Osama bin Laden's native Saudi Arabia, a group of prominent Saudis met in Paris where they conspired to pay off Osama bin Laden and his al Qaeda group to ensure that al Qaeda would never again attack within the borders of the Saudi Kingdom. This protection money served to safeguard Saudi Arabia, but also to enlarge the power of Osama bin Laden, al Qaeda, and international terrorism. Subsequent material support including payments to bin Laden and al Qaeda by certain members of the Saudi Royal Family has been verified by a senior Taliban defector.

Emboldened in terrorist ambition, in 1998, Osama bin Laden and al Qaeda orchestrated an attack on the United States embassies in the East African countries of Kenya and Tanzania. These bombings resulted in two-hundred ninety-one deaths and over five thousand injuries. The attack on the U.S.S. Cole in Yemen in October of 2000 then followed, with the brutal attacks on September 11, 2001 thereafter. Osama bin Laden and al Qaeda have publicly and proudly

proclaimed direct responsibility for these and other multiple atrocities in furtherance of international terrorism.

Direct attacks on Americans intensified in 1998 after Osama bin Laden issued this “fatwa,” stating:

We -- with God's help -- call on every Muslim who believes in God and wishes to be rewarded to comply with God's order to kill the Americans and plunder their money wherever and whenever they find it. We also call on Muslim ulema, leaders, youths, and soldiers to launch the raid on Satan's U.S. troops and the devil's supporters allying with them, and to displace those who are behind them so that they may learn a lesson.

These words provide an insight into how Osama bin Laden views the world. Osama bin Laden has not left the political intellectual era of the crusades; in this view the Middle East is the battle ground of the world's three major religions, Islam, Christianity, and Judaism. According to Islamic extremist views, a Judeo-Christian alliance has evolved which ultimately aims to conquer the holy places of Mecca, Medina, and Jerusalem. In this distorted reality, this purported alliance is responsible for all hardship and violence inflicted on Muslims throughout history. Following this world view, Osama bin Laden attempts to use terror to demonstrate to fellow Muslims that the “enemies” of Islam can be eliminated from “Muslim” lands such as his native Saudi Arabia. Toward this end, Osama bin Laden has proclaimed his intention to obtain and use biological, chemical, and nuclear weapons to wage war. He seeks these personal or political ends under the guise of religion.

### **Wahhabism**

Wahabbism is an Islamic sect founded by Mohammad Ibn Abdul-Wahhab in the 18th century. Abdul-Wahhab sought to rid Islam of the corruptions that he believed had crept into the religion from both within and without. His doctrine reverted to a strictly literal interpretation of the Koran and Wahhabism, in Abdul-Wahhab's view, became the sole source of legitimate Islamic thought and action. In direct contradiction to the civilized and moderate Arab world –



the Wahhabists refused to move beyond outdated ideologies and codes of conduct. The Wahhabi rebellions of the nineteenth and twentieth centuries establishing the power of the sect in Arabia – were defined by their violence and brutality. As the sect took power, the Al Saud family united with the Wahhabi movement, eventually making it the official form of Islam practiced in Saudi Arabia. Hence, the intimate if tenuous relationship between the House of Saud and the Wahhabists.

In recent decades, certain schools of Wahhabism have become even more virulent toward non-Islamic civilization, extolling the virtues of martyrdom for the sake of saving Islam. For example, inflammatory Khutbahs (sermons) given by the Khateeb (preacher) Salaah Al-Budair in the Mosques of Mecca and Medina in August 2001 warned of the imminent threat the West posed to Islamic civilization:

Fellow Muslims! We are nowadays confronted with a relentless war waged by the materialistic western civilization and culture that burns its producers and afflicts them with calamities, misery, immorality, disruption, suicide, and all kinds of evils . . . it is a civilization that races towards creating all means of trouble, disturbance, and destruction.

Al-Budair also emphasizes the greatness of offering to die as a martyr:

Today we Muslims and indeed the entire world can witness the greatness of martyrdom being illustrated in the uprising in Palestine in general and the Al-Aqsaa in particular. This kind of stance, which revives the magnitude and virtues of martyrdom in the heart of the Muslim nation, is exactly what we need at this time. It is vital that the Muslims exert every effort to spread the love for achieving martyrdom just like the pious early generations of Muslims did. We must continue on the same road that they were on, which is that of our Prophet, and indeed all the prophets before him, in order to support our religion and defeat our enemies.

Revive the importance of martyrdom and reawaken the spirit of seeking it! Instill the virtues of it in the hearts and minds by all methods possible. Our country [Saudi Arabia] has set an example in supporting this and donating generously in its cause from all different sections of the community. . .

Al-Budair finishes up these sermons by justifying suicide bombings:

The Jews are described in the Book of Allah as those who distort words and facts and quote them out of context and this is what they and their

supporters from the tyrant regimes all over the world are currently doing. They use false terminology to misguide, confuse, and deceive. What your brothers are committing in Al-Aqsaa are not acts of mindless violence, but rather it is a blessed uprising to resist and curtail the Jewish oppression and aggression: this is a legal right which all religions, ideologies and international laws recognize. Nobody could deny this fact except the ignorant, arrogant, or evildoers.

Such are the perverse Wahabbi sermons currently preached to inspire young men to join forces with Osama bin Laden and al Qaeda in a war against the West. As the former head of counter-terrorism for the FBI (and head of security for the World Trade Center on September 11, 2001) John O'Neill, succinctly stated: "All the answers, everything needed to dismantle Osama bin Laden's organization can be found in Saudi Arabia." The hate-filled ideology of the Wahabbists and Al-Budair confirm John O'Neill's judgement that the ideological, political and financial essence of al Qaeda, the growth of which led to the September 11, 2001 terrorist attacks, stems from certain segments in Saudi Arabia.

This ideology of violence will continue to promote worldwide terrorism until its financial and support network is dismantled. Extremist Wahhabism is inherently dangerous given its propensity to promote non-tolerance and hatred, including the following:

- (1) All non-believers, including non-Wahhabi Muslims, are guilty of shirk and apostasy;
- (2) Only Wahhabi's are true Muslims, all others are non-believers;
- (3) "Jihad" or holy war against all non-believers should be actively encouraged and participated in;
- (4) The only acceptable system of government is an Islamic State based on Sharia—or Islamic law;
- (5) In a strict and often misguided, misinterpreted and wholly unacceptable version—by almost the entire Muslim world—of Sharia law;
- (6) In a purely Islamic world, with no geographic limitations or boundaries.

Put simply, Wahhabists believe they have the right to kill anyone who disagrees with their version of Islam. One Islamic scholar stated: "Wahhabisms evil and twisted interpretation

of Islam in and of itself provides sufficient proof of the inherent dangers of Wahhabist ideology.” Osama bin Laden and his al Qaeda organization are Wahhabists who have advocated for all of the above Wahhabist beliefs, including killing all non-believers. Wahhabists do not believe in national or governmental boundaries; they seek only one belief system and one world order—and one global Islamic State, based on their ill-founded interpretations of Islam.

In the aftermath of September 11, 2001, fatwas were delivered in Saudi Arabia by Shaykhs Hamud al-Shu’aybi and Abdullah B. Jibrin which attempted to justify the terror attacks. Moreover, certain members of the Saudi Royal family have knowingly and willfully exported Wahhabi ideology in order to convert others and to deflect attention away from Saudi Arabia. Wahhabism has been rejected by almost the entire Muslim world and has been called a threat to Islam itself. Professor Hamid Algar, one of the world’s foremost Islamic scholars, stated.

First, in the extremely lengthy and rich history of Islamic thought, Wahhabism does not occupy a particularly important place. Intellectually marginal, the Wahhabi movement had the good fortune to emerge in the Arabian Peninsula (albeit in Najd, a relatively remote part of the peninsula) and thus in proximity of the Haramayn, a major geographical focus of the Muslim world; and its Saudi patrons had the good fortune, in the twentieth century, to acquire massive oil wealth, a portion of which has been used in attempts to propagate Wahhabism in the Muslim world and beyond.

The majority of Islamic scholars denounce Wahhabist practices. Wahhabist movements, such as the Taliban militia in Afghanistan, have been almost universally criticized by the Muslim world. For example, President Musharraf of Pakistan said of the Taliban: “It is an ignorant, primitive interpretation of Islam that is condemned by the entire Islamic world.” Extremist Wahhabism and the terror and use of violence it promotes, has been condemned by mainstream Muslim scholars and religious leaders as being violent, primitive and inconsistent with the principles of Islam.

These facts are widely known through the Arab world, as it was known that the Taliban was fostering and harboring these extremists. Those entities and individuals that provided

material support to the Taliban knew or should have known that they were supporting the al Qaeda terrorist organization and Osama bin Laden. The Taliban openly armed, funded, trained, provided housing, transportation, communication, false documentation, identification, weapons, explosives, personnel, and currency to al Qaeda terrorists. The Taliban knowingly financed terrorist manufacturing facilities, schools and training camps, and harbored known criminals.

Defendants knew or reasonably should have known they were providing material support to terrorists and terrorist organizations who committed the September 11, 2001 savagery that murdered thousands of innocent people. Defendants clearly knew, or clearly should have known, they were providing material support, aiding and abetting and enabling the terrorists that brutalized America and the world on September 11, 2001. By knowingly, purposely, recklessly and in many instances maliciously engaging in international terrorist activity, Defendants acts were a proximate cause of the events of September 11, 2001, for which they are jointly and severally liable. They must be held accountable. Those providing financial resources and weapons, *inter alia*, to known terrorists who openly pronounced their intention to continue to murder innocent people, specifically American citizens, were on notice of the violence such sponsorship would cause. The sponsorship of international terrorism was reasonably anticipated to cause additional senseless murders of innocent people such as those that occurred on September 11, 2001.

This Complaint is brought pursuant to Rule 42 of the Federal Rules of Civil Procedure, which allows consolidation where actions involve common questions of law or fact. The Plaintiffs herein – United States citizens and citizens of foreign nations – close family members of those killed, including mothers, fathers, wives, husbands, children, sisters and brothers of those killed, along with those injured, on September 11, 2001. Plaintiffs include victims and injured eyewitnesses from each horrific attack, including those aboard all four of the doomed flights, at both Towers of the World Trade Center, inside the Pentagon, and those killed near

Shanksville, Pennsylvania. These Plaintiffs seek full, just, timely compensation, treble damages, and punitive damages as appropriate and necessary to deter future acts of international terrorism. Because of the enormity and complexity of Defendants' collective and individual acts giving rise to liability, Plaintiffs herein provide a somewhat detailed explication of the facts as currently known or believed, which provide an abundant basis for this civil action.

While neither the government of Saudi Arabia nor the United States is a Party to this action, it is recognized that sensitive issues of United States foreign policy may nevertheless be raised, including the question of whether a suit of this nature interferes with or augments United States foreign policy interests. For this reason, it is important to note that it has been widely recognized, including by the United States government, that actions against foreign perpetrators or facilitators of terrorism is consonant with United States foreign policy objectives. This action comports with vigorously pursuing the war against terrorism, and is consistent with enabling legislation and the jurisprudence regarding the civil liability imposed on behalf of terrorism's victims. As one former national security advisor noted:

The process of discovery in this lawsuit on behalf of 9-11 families can lead to a vital contribution to our national security, and for that reason alone the United States Government should welcome the filing.

(Statement by Richard Allen, former National Security Advisor to President Ronald Reagan.)

Richard Murphy, a former United States Ambassador to Saudi Arabia, recently admitted:

I have never said that the Government of Saudi Arabia is our ally. I have said that we have common interests . . . but that does not include the protection of individual princes.

(Richard Murphy, former United States Ambassador to Saudi Arabia, to NPR Radio.)

As the United States Department of Justice itself argued before the Second Circuit Court of Appeals in a case involving international terrorism:

Any foreign person, entity, or state responsible for the intentional destruction of a U.S. aircraft, particularly one flying to the United States with many U.S. national aboard, "should reasonably anticipated being

haled into court' in the United States. Any foreign state must surely know that the United States has a substantial interest in the protection of its flag carriers and nationals in international air travel from the terrorist activity, and can reasonably expect that any action that harmed this interest would subject it to a response in many forms, including possible civil actions in U.S. courts. It is certainly in the interest of fairness and justice to do so.

(Brief by the United States Department of Justice as intervening party in *Rein vs. Libyan Arab Jamahariyah, et al.*, United States Court of Appeals for the Southern District of New York, 1998.)

As President George W. Bush stated in a joint session of Congress on September 20, 2001:

We must starve terrorists of funding, turn them against another, drive them from place to place until there is no refuge or no rest.

The evidence and substantive law in this case require that the sponsors of terrorism will be held accountable, and this is fully consistent with and done in support of United States foreign policy. As one United States government official noted "stopping the money flow is the best way to stop terrorism. Audit trails do not lie, they are the diaries of terror." Given the gravity of the existing threat and the overwhelming suffering inflicted to date, Plaintiffs herein are committed to uncovering the truth and bringing to justice those who caused the attacks to occur.

#### JURISDICTION AND VENUE

1. Jurisdiction arises pursuant to 28 U.S.C. §§ 1330(a), 1331 and 1332(a)(2), and 18 U.S.C. § 2338. Jurisdiction also arises pursuant to 28 U.S.C. §§ 1605(a)(2), 1605(a)(5) and (a)(7) (the Foreign Sovereign Immunities Act), 28 U.S.C. § 1350 ("Alien Tort Act"), the Torture Victim Protection Act, PL 102-256, 106 Stat. 73 (reprinted at 28 U.S.C.A. § 1350 note (West 1993)), and 18 U.S.C. §§2334, 2338. This Court also has jurisdiction over claims herein pursuant to 28 U.S.C. § 1367. This Court has both personal and subject matter jurisdiction over the Defendants herein.

2. As herein alleged, actions for wrongful death, permanent personal injury, trauma, loss of consortium, companionship, survival, and related torts perpetrated by a Foreign State, such as The Republic of Sudan, through its agencies, instrumentalities, its officials, employees and/or agents, fall within the exceptions to jurisdictional immunity under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7).

3. Venue is both proper and convenient in this District pursuant to 28 U.S.C. §§ 1391(d), 1391(f)(4), and 28 U.S.C. § 2334.

PARTIES

**PLAINTIFFS**

4. Plaintiffs listed in the caption of this action are citizens or residents of the United States of America, and citizens or residents of foreign nations, who lost loved ones on September 11, 2001. Plaintiffs include the Executors, Administrators or Personal Representatives of the Estates of persons killed, along with the close family members, parents, spouses, children and siblings of those lost. Also included are persons injured in the September 11, 2001 terrorist attacks. The attacks utilized commercial aircraft which crashed into the World Trade Center North and South Towers in New York City, the Pentagon in Virginia and a field in Shanksville, Pennsylvania. Plaintiffs' include passengers or crew members on board American Airlines Flights 11 and 77, United Airlines Flights 175 and 93, persons present at both towers of the World Trade Center in New York, and persons present at the Pentagon in Virginia. Plaintiffs herein number over 3,000, and include persons from all walks of life. The names, numbers, residency, familial relationship and additional specific allegations for each Plaintiff can be found in the Appendix to the Third Amended Complaint filed herewith pursuant to F.R.C.P. 15(d) and Case Management Order No. 1, dated October 7, 2002. This Appendix to the Third Amended Complaint is incorporated herein, as if fully set out, by reference.

FACTUAL ALLEGATIONS AGAINST DEFENDANTS

**BACKGROUND**

5. Plaintiffs incorporate herein all previous paragraphs, including the introduction, and allege herein fully upon information and belief.



6. Osama bin Laden and al Qaeda have admitted responsibility for the September 11, 2001 terrorist attacks.

7. On September 11, 2001, al Qaeda co-conspirators, Mohammed Atta, Abdul Alomari, Wail al-Shehri, Waleed al-Shehri, and Satam al-Suqami hijacked American Airlines Flight 11, bound from Boston to Los Angeles, and crashed it into the North Tower, or Tower One, of the World Trade Center in New York.

8. On September 11, 2001, al Qaeda co-conspirators, Marwan al-Shehhi, Fayez Ahmed (a/k/a Banihammad Fayez), Ahmed al-Ghamdi, Hamza al-Ghamdi, and Mohald al-Shehri hijacked United Airlines Flight 175, bound from Boston to Los Angeles, and crashed it into the South Tower, or Tower Two, of the World Trade Center in New York.

9. On September 11, 2001, al Qaeda co-conspirators, Khalid ad-Midhar, Nawaf al-Hazmi, Hani Hanjour, Salem al-Hamzi, and Majed Moqed hijacked American Airlines Flight 77, bound from Dulles Airport in Sterling, Virginia to Los Angeles, California, and crashed it into the Pentagon in Arlington, Virginia.

10. On September 11, 2001, al Qaeda co-conspirators, Ziad Jarrah, Ahmed al-Haznawi, Saaed al-Ghamdi, and Ahmed al-Nami hijacked United Airlines Flight 93, bound from Newark, New Jersey to San Francisco, California. In an act of defiant courage, the passengers of Flight 93 overtook the hijackers, resulting in its crash in Shanksville, Pennsylvania, prior to reaching its target in Washington, D.C.

11. All nineteen (19) hijackers were members of Osama bin Laden's al Qaeda terrorist group. Fifteen (15) of the nineteen suicide hijackers were Saudi Arabian nationals. All received sponsorship, training, support and funding through Osama bin Laden and his al Qaeda terrorist network. All Plaintiffs herein were killed and injured as a direct and proximate cause of the acts of these criminals, the acts of their al Qaeda co-conspirators and sponsors, and the acts of Defendants herein to sponsor these reasonably foreseeable acts.

12. Defendant and co-conspirator Zacarias Moussaoui (or "Moussaoui") was born in France of Moroccan descent on May 30, 1968. Before 2001, he was a resident of the United Kingdom. Moussaoui is the alleged "20<sup>th</sup> hijacker." Moussaoui was schooled in the United Kingdom and traveled extensively, frequenting many Middle Eastern countries including Afghanistan. In December 2001, a grand jury in the Eastern District of Virginia criminally indicted Moussaoui for acts of international terrorism, specifically the attacks of September 11, 2001.

13. On August 28, 2002, German prosecutors brought charges against co-conspirator Mounir el-Motassadeq (or "el-Motassadeq"), a Moroccan man accused of supporting members of the Hamburg al Qaeda terrorist cell and helping to plan and carry out the September 11, 2001 terrorist attacks.

14. Mounir el-Motassadeq is an al Qaeda co-conspirator. His indictment was the first formal criminal charge brought by German authorities in connection with the September 11, 2001 attacks. El-Motassadeq was arrested in November of 2001 on evidence that he had access to the bank account of one of the suicide hijackers and arranged wire transfers to hijackers while they were learning to fly in the United States. He is charged with participation in the terrorist attacks of September 11, 2001, in the United States.

15. When arrested in 2001, prosecutors said el-Motassadeq was a close associate of Mohamed Atta, one suspected ringleader of the plot. In 1996, el-Motassadeq was one of the witnesses who signed Mr. Atta's will. El-Motassadeq managed the finances of another hijacker, Marwan al-Shehhi, and that the money was used to help al-Shehhi pay for his flight lessons in the United States and cover living expenses there. According to the criminal indictment, these funds were used to support members of the terrorist group al Qaeda.

16. El-Motassadeq admitted that he knew the September 11, 2001, hijackers, but he provided conflicting versions of the nature and intensity of those contacts. At times el-

Motassadeq said he knew them only through the Al Quds mosque, which was attended by Atta and other hijackers. On other occasions, he said he had visited the apartment on Marienstrasse where Atta lived. El-Motassadeq and Atta were both students at TUHH University in Hamburg.

17. In July 2000, el-Motassadeq traveled to Karachi, Pakistan for a 'vacation.' The Pakistanis later confirmed that he had been in the country at this time and that there were indications that he had visited an al Qaeda camp in Afghanistan. In May 2001, el-Motassadeq visited the Stade nuclear plant near Hamburg, Germany.

### **The Hamburg al Qaeda Cell**

18. In summer of 1999 or earlier, a group of Muslim students in Hamburg joined forces with the express goal of implementing in countries of Western culture, especially in the United States of America, the "Holy War" ("Jihad") to be propagated by them by means of international terror. The group's members included Mohammed El Amir Awad Elsayed Atta (or "Atta"), Marwan Yousef Mohamed Rashed al-Shehhi (or "al-Shehhi"), and Ziad Samir Jarrah (or "Jarrah"), (hijackers, all of whom died in the course of the attacks), co-conspirators, or Defendants Ramzi Mohammed Abdullah Binalshibh (a/k/a Ramzi Mohamed Abdallah Omar), Zakariya Essabar, Said Bahaji, as well as Mounir el-Motassadeq.

19. As a result of the members' shared religious beliefs, origins and violence-prone Islamic-fundamentalist ideology as well as their close relationships among themselves, the organization was closed to the outside world and is best described as a conspiratorial enterprise, which served as one of the organizational units of an international network of violence-prone radical extremists under the control or guidance of al Qaeda. The organization, which attempted to present itself as a regular group of foreign students, underpinned its efforts to facilitate acts of terror by a strict mandate to subordinate individual opinions to the group's political goals.

20. Initially, the principal meeting point of the Hamburg cell was the apartment rented by Atta, Bahaji and Binalshibh in Hamburg-Marburg, which temporarily served as al-

Shehhi's residence, too. El-Motassadeq, Essabar and Jarrah convened for meetings of the group at this location. In September 1999, the apartment al-Shehhi rented nearby served as an alternative base of operations. In October of 1999, after al-Shehhi and Atta moved into the second apartment, it also became the primary address of el-Motassadeq.

21. In October of 1999 or earlier, the group's members finalized their terrorist scheme, which called for the use of airplanes in "jihad" to kill as many "infidels" in the United States as possible. In order to coordinate details and logistical support with the responsible representatives of the international terrorism network, they resolved to travel to Afghanistan in two groups.

22. In late November of 1999, the three hijackers (Atta, al-Shehhi and Jarrah) and Binalshibh traveled on almost identical dates to the common destinations of training camps run by al Qaeda. Aside from providing training in military operations, the camps served the purpose of heightening radical extremist ideology and fostering an inner resolve among recruits to sacrifice their own lives fighting the "godless enemies." A stint in these camps is regarded as an essential condition of joining the international jihad and belonging to a terrorist group. While al-Shehhi was back in Hamburg for a few days in early January 2000 (only to leave the country again until late March 2000), Jarrah did not return until late January. Atta stayed until late February and Binalshibh re-entered Germany in March 2000.

23. In spring of 2000, a second group traveled to Afghanistan. El-Motassadeq flew from Hamburg to Karachi on May 22, 2000, and returned on August 1, 2000. In the meantime, he underwent military training in a camp near Khandahar, Afghanistan.

24. In accordance with the plans for the attacks discussed in Afghanistan, the three terrorists began making arrangements for pilot training in the United States upon their return. Accordingly, in March 2000, Atta contacted 31 flight schools in the United States via email from Hamburg, inquiring about the possibilities and conditions of flight training for two or three men

from different Arab countries. On March 26, 2000, Jarrah signed an agreement to receive pilot training at the Florida Flight Training Center in Venice, Florida, and on March 30, 2000, transferred the amount of 349 German Marks to the account of the flight school's Munich representative.

25. On May 25, 2000, Jarrah applied for a United States entry visa, which he received without difficulties, as Atta had before him, on May 18, 2000. Al-Shehhi had received his United States entry visa from the United States consulate in Dubai, United Arab Emirates (UAE), on January 10, 2000. All three terrorists had previously obtained new passports.

26. Following their entry into the United States (al-Shehhi arrived on May 29, 2000, Atta on June 3, 2000), al-Shehhi and Atta opened a joint bank account on July 18, 2000, with Sun Trust Bank in Venice, Florida, through which they obtained financing and material support for their stay in the United States – from backers within the international terrorist network. On July 7, 2000, they started taking flight lessons together at the flight school Hoffman Aviation in Venice, Florida. By December 21, 2000, they had successfully completed their training, receiving professional pilot licenses from the Federal Aviation Administration.

27. Atta and al-Shehhi then put their acquired skills to the test on a Boeing 727 flight simulator at the Simulations Center in Opa-Locks, Florida, in December 2000, and by taking several exercise flights at the Advanced Aviation Flight Training School in Lawrenceville, Georgia, and at the flight school in Decatur, Georgia, in January and February 2001, respectively.

28. Jarrah entered the United States on June 26, 2000, and, until January 13, 2001, underwent pilot training at the Florida Flight Training Center (F.F.T.C.) in Venice, Florida, where he obtained a private pilot license. Between December 15, 2000, and January 5, 2001, he took flight lessons at the Aeroservice Aviation Center in Virginia Gardens, Florida.

29. The plan of the organization to send Binalshibh to be trained as the fourth pilot alongside Jarrah at the F.F.T.C. in Venice, Florida, was frustrated as Binalshibh's applications for a non-immigrant visa for the United States were denied.

30. To take Binalshibh's place, Essabar was to be sent to the United States to undergo pilot training. Like Atta, al-Shehhi and Jarrah before him, Essabar attempted to obscure his visit to Pakistan by obtaining a new passport from the Moroccan embassy in Berlin on October 24, 2000. But because United States authorities denied Essabar's visa applications, too, this plan could not be realized, either. Instead, it was Zacarias Moussaoui, now detained and indicted in the United States for his involvement in the preparations for the attacks of September 11, 2001, who traveled to the United States following an eight-week visit to Pakistan, and enrolled in flight school. However, due to Moussaoui's arrest on August 17, 2001, he never completed his training.

31. El-Motassadeq and the other al Qaeda co-conspirators who remained in Hamburg, continued to be involved in the preparations for the attacks. In particular, they were responsible for ensuring that the terrorists and Zacarias Moussaoui had sufficient funds to finance their stay and training in the United States.

32. For the purpose of coordinating the preparations for the attacks between the group members who remained in Hamburg and those who had traveled to the United States, several meetings were held for group members in Germany and Spain. Accordingly, Binalshibh and Jarrah met on January 4, 2001, in Bochum or Dusseldorf. Later, Binalshibh traveled to Berlin to meet Atta, who had arrived there no later than January 6, 2001, after spending time in Spain and returning to the United States on January 10, 2001. Another meeting between Atta and Binalshibh on July 17 or July 18, 2001, in Tarragona, Spain, served the purpose of coordinating the exact times of the attacks.

33. El-Motassadeq, together with Bahaji, acted as the resident administrator of the terror organization in Hamburg. El-Motassadeq's chief responsibility consisted of securing funding for the group's terrorist activities. He made use of al-Shehhi's account, which provided as a source of financing. El-Motassadeq made sure that the account continued to receive sizeable support payments from sources in the United Arabian Emirates and elsewhere by transferring semester fees to maintain the status of al-Shehhi as a student, thus securing the latter's right to remain in Germany and meeting the condition of future payments. Shortly before al-Shehhi left for Afghanistan, in late November 1999, el-Motassadeq had also received control over the former's account along with al-Shehhi's bank card, which he used not only to transact financial and other personal business on behalf of al-Shehhi to cover up the latter's absence, but also to distribute the funds needed. He transferred funds from al-Shehhi's to Binalshibh's account which the latter passed on to al-Shehhi in the United States, who used it to finance his flight training. During the absence of al-Shehhi, several cash withdrawals were made to provide funding for the intended flight training of Binalshibh and Essabar and to benefit other cell members and promote acts of international terrorism.

34. Defendant Khalid Sheik Mohammed is a Kuwaiti of Pakistan descent who has participated in violent acts of international terrorism against Americans since at least 1993. Khalid Sheik Mohammed holds himself out as head of the military committee of al Qaeda. Khalid Sheik Mohammed has publicly taken "credit" for the atrocities of September 11, 2001, as well as the 1993 World Trade Center bombing and the 1995 plot to use airliners as weapons. Khalid Sheik Mohammed aided, abetted, materially supported and conspired with al Qaeda operatives in planning the September 11, 2001 attacks, including Mohammed Atta, Ramzi Binalshibh, and others.

35. Umar Faruq (or "Faruq") is a high level al Qaeda operative and terrorist co-conspirator. Co-conspirator Faruq was born May 24, 1971, and is a member of the al Qaeda

terrorist organization who was arrested in or about May 2002. According to the confession of Abu Zubaydah, top al Qaeda leader detained by the United States authorities, Umar Faruq was senior al Qaeda representative in Southern Asia. An interrogation of Umar Faruq was conducted by United States authorities at the United States air force base in Baghram, Afghanistan, on May 23, 2002.

36. During a custodial interview on Sept 9, 2002, Umar Faruq confirmed that he was al-Qaeda's senior representative to Southeast Asia and was initially sent to the region by Abu Zubaydah and Ibn Sheik Al-Libi to plan large-scale attacks against United States interests in Indonesia, Malaysia, Philippines, Singapore, Thailand, Taiwan, Vietnam and Cambodia. In particular, Faruq prepared a plan to conduct simultaneous car/truck bomb attacks against United States embassies in the region to take place on or about September 11, 2002.

37. Abdelghani Mzoudi is a co-conspirator who provided logistical support to Mohammed Atta and other suicide hijackers. Abdelghani Mzoudi is also alleged to have attended terrorist training camps in Afghanistan in the summer of 2000. He is currently jailed in Germany. Abdelghani Mzoudi provided material logistical support to Ramzi bin al Shibh and al Qaeda.

38. Haji Jamshed is an al Qaeda co-conspirator and a principal financier in the creation and management of al Qaeda training camps.

39. Al Qaeda leader Abd al-Rahim al-Nashiri, one of the network's chief of operations in the Persian Gulf, was recently captured by United States officials. Abd al-Rahim al-Nashiri (a/k/a Umar Mohammed al-Harazi, a/k/a Abu Bilal al-Makki) is a known al Qaeda operative who engaged in acts of international terrorism.

#### The Banking Defendants

### **The Islamic Banking System and its Role in International Terrorism**



40. Beginning in the late 1970s, upon the receipt of large amounts of wealth, Saudi Arabia and other Gulf countries refined a banking system aimed at promoting and propagation of Islam around the world. The main financial vehicle to fund Islam was set up under the Islamic principle of Zakat, a legal almsgiving required as one of the five pillars of Islam at the standard rate of 2.5% on current assets and other items of income.

41. According to the Koran, only the poor and needy deserve Zakat. But some, for example, Omar Abu Omar (a/k/a Abu Kutada) an al-Qaeda principal in the United Kingdom, have acted to influence a trend to support those fighting the cause of Allah through Zakat funds.

42. As a result, the Zakat legal and religious duty has been usurped and abused by terrorists. John B. Taylor, Undersecretary of Treasury for International Affairs, stated in April 2002, that preventing terrorists from abusing financial institutions was a main goal in the war against terrorism.

43. Most of the Gulf State countries lack effective regulations to impose rules of accounting and auditing. The al Qaeda network extensively relied on funds diverted from the Zakat and other direct donations from sponsors through Islamic banks. Since 1998, Osama bin Laden made regular calls for Muslims to donate through the zakat system to his organization. In December 1998, during an interview with ABC News, he stated that:

Muslims and Muslim merchants, in particular, should give their zakat and their money in support of this state [Taliban regime] which is reminiscent of the state of Medina (Al- Munawwarah), where the followers of Islam embraced the Prophet of God.

44. In September 2001, in a interview with Pakistani newspaper Ummat, he declared that:

Al-Qaida was set up to wage a jihad against infidelity, particularly to counter the onslaught of the infidel countries against the Islamic states. Jihad is the sixth undeclared pillar of Islam. [The first five being the basic holy words of Islam ("There is no god but God and Muhammad is the messenger of God"), prayers, fasting (in Ramadan), pilgrimage to Mecca and giving alms (zakat).].

45. Osama bin Laden himself, in partnership with several Saudi and Gulf Islamic banks, founded a banking institution in Sudan that provided funding for terrorist operations. Several banks helped transferring funds to al Qaeda through the Zakat system, by direct donations, or by knowingly providing means to raise or transfer funds to the terrorist organization. Some banks controlled the Zakat fund beneficiaries, including charities, that have provided financial and logistical support to al Qaeda.

46. Islamic banking facilities, instruments and tools have provided essential support to the al Qaeda organization and operations. The banking Defendants in the lawsuit have acted as instruments of terror, in raising, facilitating and transferring money to terrorist organizations. In doing so, the banking defendants herein utilize, are part of, and/or are engaged in the international banking system and are subject to its rules, standards and practices.

#### **Al Baraka Investment and Development Corporation**

47. Al Baraka Investment & Development Corporation (or "al Baraka"), a wholly owned subsidiary of Dallah Albaraka Group LLC (or "Dallah Albaraka"), is based in Jeddah, Saudi Arabia. Its investments include 43 subsidiaries, mainly banks in Arab and Islamic countries. Most of them are known as or registered as "al Baraka Bank." United States assets include al Baraka Bancorp Inc. in Chicago, Illinois, and al Baraka Bancorp Inc. in Houston, Texas.

48. A memo from the Russia Federation's Security Service details the al Baraka Bank's role in funding Defendant al-Haramain:

On existing knowledge, part of the obtained financing comes from the charitable collections (Zakat) and goes to the personal foreign accounts of field commanders, including Khattab and Basayef.

49. Al Baraka provided Osama bin Laden with financial infrastructures in Sudan beginning in 1983. For example, the use of al Baraka Bank by al-Haramain was confirmed by a

statement from al-Haramain chairman, Aqueel al-Aqueel, who declared that the charity maintained accounts at al Baraka Bank in Saudi Arabia.

50. Al Baraka Investment & Development is mostly present in the Sudanese banking sector, through assets held in Algharb Islamic Bank, Al Shamal Islamic Bank, Faisal Islamic Bank, Sudanese Islamic Bank and Tadamon Islamic Bank. Al Baraka is also affiliated with the National Development Bank in Sudan.

51. Defendant Saleh Abdullah Kamel was born in Makkah, Saudi Arabia, in 1941. After being the adviser to the Saudi Minister of Finance, in 1969 he founded Dallah Albaraka Group LLC, quickly establishing himself as one of the leading promoters of an Islamic financial and banking system capable of rivaling large Western institutions.

52. Dallah Albaraka Group LLC, a diversified conglomerate based in Jeddah, Saudi Arabia, is involved in various industries, services and financial activities. The group includes twenty-three banks in Arab and Islamic countries, in addition to several investment and financial companies.

53. Dallah Albaraka Group LLC's portfolio includes a wholly owned subsidiary specializing in aviation-services, Dallah Avco Trans-Arabia Co Ltd. The company was formed in 1975 and is based in Jeddah, Saudi Arabia.

54. Two of the hijackers on September 11, 2001, of American Airlines Flight 77, Nawaf al Hazmi and Khalid al Mihdhar, received funding from Omar al Bayoumi (a/k/a Abu Imard), a Saudi national who paid their house rent in San Diego. Omar al Bayoumi is listed as a suspect wanted by the FBI in connection with the September 11, 2001 attacks.

55. Omar al Bayoumi was Assistant to the Director of Finance for an al Baraka company, Dallah Avco, a position he gave as a reference in an application for admission to Case Western Reserve University in Cleveland, Ohio in 1998.

56. On May 5, 1998, Omar Al Bayoumi registered a fictitious company name called Masjid al Madinah al Munawarah (a/k/a Masjid al Madinah al Munawarah) based in San Diego, California. In March 25, 1999 a mosque was registered in the State of Pennsylvania under the name of Masjid al Madinah al Munawwarah, Inc.

57. Dallah Albaraka Group LLC's financial arm is al Baraka Investment & Development (or "ABID"), a wholly owned subsidiary based in Jeddah, Saudi Arabia.

58. Saleh Abdullah Kamel, Chairman of Dallah al Baraka and al Baraka Bank, was one of the three founding members of Al Shamal Islamic Bank. Saleh Abdullah Kamel founded the bank in 1983, along with a Sudanese company, Al Shamal Investment and Development, and the Government of Northern State, then controlled by Governor Mutasin Abdel-Rahim, representative of Hassan al-Turabi.

59. The practice and policy of Dallah Albaraka Group LLC and al Baraka Bank is to provide financial support and material assistance to international terrorist organizations including al Qaeda.

60. In 1998, al Aqsa Islamic Bank was established with \$20 million in capital. The main shareholders were Dallah al Baraka Group LLC and the Jordan Islamic Bank. Jordan Islamic Bank, a Dallah al-Baraka LLC subsidiary, owns 14 percent of al-Aqsa Islamic Bank. Saleh Abdullah Kamel acknowledged that Dallah al-Baraka Group LLC owns another twelve percent directly.

61. Since 1998, Israel has refused to approve the bank, citing its obvious ties with known terrorists. At the beginning of 2001, several antiterrorist authorities from Israel visited Citibank's headquarters in New York to warn its directors of the nature of the bank's activities with respect to international terrorism.

62. Al Baraka provided support to the "charity" al-Haramain operations and helped transfer funds for Osama bin Laden operations, as reported by the Bosnian Intelligence Agency

(Agency for Investigation and Documentation – AID) in a memorandum titled “Some illegal activities of humanitarian organizations investigated by the relevant investigative bodies of the Federation of Bosnia Herzegovina (FbiH)”:

Records available for 1998 show a flow of money into the so-called “operating” account of the HO [Humanitarian Organization] at the Deposit Bank, Sarajevo, from the “main” account, sent from Saudi Arabia via the Deutsche Bank and the Albaraka Bank in Turkey. The amount is 1,059,687 DEM [\$2.13 million].

63. Al Baraka Turkish Finance House, an al Baraka branch in Turkey, is a subsidiary of Dallah al Baraka Group LLC.

64. A Bosnian Intelligence memo regarding the activities of al-Haramain states the following:

Given all the above security factors, we believe that the clear lack of any concrete humanitarian projects indicates that the existence of this HO [Humanitarian Organization] was a fictitious cover . . .

65. The report establishes al-Haramain’s role in financing and assisting Osama bin Laden’s operations.

[t]he Saudi HO [Humanitarian Organization] al-Haramain, . . . has acted as a channel for financing the activities of terrorist organizations. . . . According to available intelligence, the Sarajevo office assisted the terrorist organization Gama al Islamiya, while members of bin Laden’s el Itihad al Islamiya (AI) terrorist groups were employed at the Somalia offices, which also financed their operations.

66. Additional allegations regarding the charity Defendant al-Haramain are detailed below.

### **Al Shamal Islamic Bank**

67. Al Shamal Islamic Bank was formed in the Republic of Sudan (or “Defendant Sudan” or “Sudan”) on April 1983, and started operations on January 2, 1990, with a paid capital of \$3.9 million. Shares were issued between 1997 and 2000. In or about the same year of the

bank's formation, Osama bin Laden moved several of his Saudi businesses and assets, or extended the reach of these businesses and assets, into the Republic of Sudan (or "Sudan").

68. A United States' State Department fact sheet on Osama bin Laden, dated August 14, 1996, notes Osama bin Laden's operations in Sudan since 1983: "In a 1994 interview, Bin Ladin claimed to have surveyed business and agricultural investment opportunities in Sudan as early as 1983."

69. In 1989, Hassan al Turabi installed a radical extremist Islamic government in Sudan through a *coup*. In 1991, Osama bin Laden settled in Sudan, by invitation of Hassan al Turabi and the Sudanese government. A 1996 State Department fact sheet on Osama bin Laden described his operations in the country beginning in 1991:

Bin Ladin relocated to Sudan in 1991, where he was welcomed by National Islamic Front (NIF) leader Hasan al-Turabi. (...) [bin Laden] embarked on several business ventures in Sudan in 1990, which began to thrive following his move to Khartoum. Bin Ladin also formed symbiotic business relationships with wealthy NIF members by undertaking civil infrastructure development projects on the regime's behalf.

70. Osama bin Laden's close relationship with the new extremist Sudanese regime became symbiotic and he conducted several business projects with or on behalf of the NIF. One of these investments was the Al Shamal Islamic Bank, as reported by the State Department:

Bin Ladin and wealthy NIF members capitalized al-Shamal Islamic Bank in Khartoum. Bin Ladin invested \$50 million in the bank.

71. Osama bin Laden's involvement in business transactions in Sudan including the Al Shamal Islamic Bank was confirmed by a 2002 Congressional Research Service Report:

In 1991, bin Laden relocated to Sudan with the approval of Sudan National Islamic Front (NIF) leader Hasan al-Turabi. There, in concert with NIF leaders, [bin Laden] built a network of businesses, including an Islamic Bank (al Shamal), an import-export firm, and firms that exported agricultural products. An engineer by training, bin Laden also used his family connections in the construction business to help Sudan build roads and airport facilities. The business in Sudan (...) enabled him to offer safe haven and employment in Sudan to al Qaeda members, promoting their

involvement in radical Islamic movements in their countries of origin (especially Egypt) as well as anti-U.S. terrorism.

72. Al Shamal Islamic Bank was founded in 1983 by three individuals or entities: (1) Al Shamal for Investment and Development, a Sudanese company; (2) Defendant Saleh Abdullah Kamel, Chairman of the Saudi Dallah al Baraka Group LLC; and (3) the Sudanese Government of Northern State, then controlled by Governor Mutasim Abdul-Rahim, Secretary General of the National Congress Party in Khartoum, and representative of extremist Hassan al-Turabi.

73. In April 1984, the Al Shamal Bank issued shares to its main founders. They included the Government of Northern State, the Defendant Faisal Islamic Bank – Sudan, Defendant Saleh Abdullah Kamel, his brother Omar Abdullah Kamel, and Defendant al Baraka Investment and Development (ABID), a wholly owned subsidiary of Dallah al Baraka Group LLC and Defendant Saleh Abdullah Kamel.

74. Among the shareholders of the Al Shamal Bank was Defendant Faisal Islamic Bank – Sudan, a subsidiary of Islamic Investment Company of the Gulf (Bahrain) EC, whose parent company is Defendant Dar-al-Maal al Islami (DMI), based in Switzerland. The three entities are chaired by Defendant Mohammed al Faisal al Saud, and controlled by Saudi investors.

75. Al Shamal Islamic Bank Chairman and shareholder, Defendant Adel Abdul Jalil Batterjee, is the Chairman of al-Bir Saudi Organization, whose United States branch, Benevolence International Foundation (or “BIF”), is also a front for al Qaeda sponsorship.

76. Defendant Adel Abdul Jalil Batterjee is both Chairman of the Al Shamal Islamic Bank and was also Chairman of the World Assembly of Muslim Youth. Batterjee is the subject of an FBI investigation for terrorist activities and is implicated in the criminal indictment of Enaam Mahmoud Arnaout of BIF.

77. Al Shamal Islamic Bank General Manager, Mohammad S. Mohammad, acknowledged in a September 2001 press release that Osama bin Laden had two accounts in the bank, opened on March 30, 1992 in the name of al-Hijrah Construction and Development Ltd. This company, according to the United States Department of State, worked directly with Sudanese military officials to transport and provide provisions to terrorists training in Osama bin Laden's terrorist training camps in northern Sudan.

78. A third Al Shamal Bank account was opened in 1993 in the name of Osama bin Laden's company, Wadi al Aqiq, a company registered in Saudi Arabia. The import-export firm, in conjunction with Osama bin Laden's Taba Investment Company Ltd., secured a near monopoly over Sudan's major agricultural exports of gum, corn, sunflower, and sesame products in cooperation with prominent NIF members.

79. Al Shamal Bank has repeatedly been used to fund criminal and terrorist activities. A former associate of Osama bin Laden, Jamal Ahmed al-Fadl, testified during the United States trial on the 1998 embassy bombings in Africa, that Osama bin Laden and at least six al Qaeda operatives held bank accounts in Al Shamal Islamic Bank under their real names.

Q. While you were in the Sudan, did you handle money for Osama bin Laden?

A. Could you repeat the question.

Q. Did you work on the finances for al Qaeda while you were in the Sudan?

A. Yes.

Q. Did you know where the bank accounts of Osama bin Laden and al Qaeda were?

A. Yes.

Q. Do you know whose names they were in?

A. The bank account under Osama bin Laden in Bank Shaml [al Shamal Islamic Bank], Khartoum.

Q. That was under Osama bin Laden's true name?

A. Yes.

Q. Were there accounts in other names?

A. Yes. Afad Makkee got account also.

Q. Afad Makkee, the account that he had under his name, do you know what name that is?

A. I remember Madani Sidi al Tayyib.



Q. Do you know of any other persons who had al Qaeda money in their accounts?

A. Abu Rida al Suri.

Q. Do you know his true name?

A. Nidal.

Q. Anyone else that you knew had al Qaeda money in bank accounts in their name?

A. Abu Hajer al Iraqi.

Q. Do you know his true name?

A. Mamdouh Salim.

Q. Did you have any accounts in your name?

A. Shared with Abu Fadhl.

Q. So you had accounts in your name that were shared with Abu Fadhl?

A. Yes.

Q. Do you recall anyone else that had bank accounts in their name for al Qaeda?

A. Abdouh al Mukhlafi.

80. Jamal Ahmed al-Fadl also testified that al Qaeda operatives received monthly checks of several hundred dollars from Al Shamal Islamic Bank accounts:

Q. When you worked for Osama bin Laden, in the Sudan, how much were you paid?

A. \$1,200 . . . per month.

Q. For how long did you work for him?

A. Almost two years.

Q. What banks did he keep his money at?

A. Bank el Shamar [Al Shamal Islamic Bank].

Q. Any other banks?

A. I think he had accounts in different banks, but I only recall Bank Shamar [al Shamal Islamic Bank].

81. Jamal Ahmed al-Fadl also testified that he transferred \$100,000.00 from Al Shamal Islamic Bank to an al Qaeda representative in Jordan:

Q. How did you carry the \$100,000?

A. In my bag with my clothes.

Q. Do you recall what kind of bills the \$100,000 was in?

A. I remember they all hundred bill.

Q. Sorry?

A. They all hundred bill.

Q. They were all hundred dollar bills?

A. Yes.

Q. Who gave you the money?

A. Abu Fadhl, he bring it from Shamal Bank [al Shamal Islamic Bank] and he bring it to me.

Q. Abu Fadhl brought it from the Shamal Bank [al Shamal Islamic Bank]?

A. Yes.

82 During the course of the same trial, another associate of Defendant Osama bin Laden, Essam al Ridi, testified that the Al Shamal Bank was used for al Qaeda operational purposes, stating that "\$250,000 was wired from Al Shamal Islamic Bank" in 1993 via Bank of New York to a Bank of America account held in Dallas, Texas -- where he used it to "buy a plane delivered to bin Laden . . . intended to transport Stinger missiles. . . ." in 1993.

83. Following September 11, 2001, the Chairman of the Senate Armed Services Committee and Chairman of the Permanent Subcommittee on Investigation of the Governmental Affairs Committee testified that Defendant Al Shamal Islamic Bank operations continue to finance and materially support international terrorism and that there are indications that Osama bin Laden remains the leading shareholder of that bank.

#### **Al-Rajhi Banking and Investment Corporation**

84. Officially founded in 1987, Defendant al-Rajhi Banking & Investment Corporation, (or "al-Rajhi Bank") has a network of nearly 400 branch offices throughout Saudi Arabia and manages seventeen subsidiaries across the world. Defendant Sulaiman Abdulaziz al-Rajhi is the Managing Director of al-Rajhi Banking & Investment Corporation and Defendant Saleh Abdulaziz al-Rajhi is the Chairman.

85. The al-Rajhi Banking & Investment Corporation is the primary bank for a number of charities that serve as al Qaeda front groups. Al-Haramain Islamic Foundation, the Muslim World League, and the International Islamic Relief Organization all funnel terrorism financing and support through the al-Rajhi Banking & Investment Corporation financial system. One of the hijackers in the September 11, 2001 attack, Abdulaziz al-Omari, who was aboard American Airlines Flight 11, held an account with al-Rajhi Banking & Investment Corporation.

86. Defendant Sulaiman Abdul Aziz al-Rajhi has a history of financially supporting al Qaeda terrorists. Sulaiman Abdul Aziz al-Rajhi managed the National Commercial Bank budget of the Saudi Joint Relief Committee. The al-Rajhi family is also the primary financier of the SAAR Foundation Network and, as such, is implicated by the SAAR Network's sponsorship of terrorism and Osama bin Laden. Saleh Abdulaziz al-Rajhi has been closely linked to Osama bin Laden's personal secretary and convicted terrorist, Wadih el-Hage. When the Kenyan house of Osama bin Laden's personal secretary, Wadih el-Hage, was raided in 1997, information regarding Saleh Abdulaziz al-Rajhi was discovered. Wadih el-Hage is a known al Qaeda member who was convicted for the 1998 United States Embassy bombings in Kenya and Tanzania.

87. Co-conspirators, agents, aiders and abettors of the al-Rajhi banking scheme to fund or otherwise materially support terrorism include: Sulaiman Abdul Aziz al-Rajhi, Saleh al-Rajhi, Abdullah Sulaiman al-Rajhi, and Khalid Sulaiman al-Rajhi. All of these Defendants do business in and have a significant business presence in the United States, including but not limited to, through al-Watania Poultry, one of the World's largest poultry businesses, and through Defendants Mar-Jac Poultry, Inc., Mar-Jac Investments, Inc. and Piedmont Poultry. They are also material sponsors of international terrorism.

### **National Commercial Bank**

88. The National Commercial Bank (or "NCB") was founded in 1950 by Salim bin Mahfouz. Defendant Khalid bin Salim bin Mahfouz was born in Hadramaut, Yemen, on September 12, 1928. Khalid bin Salim bin Mahfouz is the son of Salim bin Mahfouz, who emigrated to Saudi Arabia in or about 1930. The National Commercial Bank was the first commercial bank of Saudi Arabia, based in Jeddah. After Salim bin Mahfouz's death in 1986, his son Khalid bin Mahfouz became President and CEO of the National Commercial Bank and remained in that position until 1999, becoming its principal shareholder with control over more

than 50% of the bank's capital. The NCB has several wholly-owned subsidiaries, including SNCB Corporate Finance Ltd. in London, SNCB Securities Ltd. in London, and SNCB Securities Ltd. in New York City through which it operates an international banking enterprise.

89. The National Commercial Bank was implicated between 1986 and 1990 in the fraudulent schemes and practices of the Bank of Credit and Commerce International (or "BCCI"). NCB Chairman Khalid bin Salim bin Mahfouz became Chief Operating Officer and major shareholder of BCCI. A 1992 United States Senate Report on the BCCI scheme detailed the role of National Commercial Bank in hiding assets, money laundering, the cover-up and obstruction of a Senate investigation, and sponsoring international terrorism. The National Commercial Bank was used by Osama bin Laden and al Qaeda as a financial arm, operating as a financial conduit for Osama bin Laden's operations. As a former CIA counter-terrorism expert explained in October 2001:

How does the al Qaeda organization fund its worldwide network of cells and affiliated groups? Several businessmen in Saudi Arabia and in the Gulf contribute monies. Much of the money is paid as 'protection' to avoid having the enterprises run by these men attacked. There is little doubt that a financial conduit to Bin Laden was handled through the National Commercial Bank, until the Saudi government finally arrested a number of persons and closed down the channel. It was evident that several wealthy Saudis were funneling contributions to Bin Laden through this mechanism. Now, it appears, that these wealthy individuals are siphoning off funds from their worldwide enterprises in creative and imaginative ways.

90. The bin Mahfouz family businesses are organized through a series of "holding" companies, including a conglomerate, Saudi Economic and Development Company LLC (Sedco), founded in 1976 and based in Jeddah, and the petroleum company, Nimir Petroleum, which is chaired by Khalid bin Mahfouz's son.

91. Between 1986 and 1990, Khalid bin Salim bin Mahfouz was Chief Operating Officer of the Bank of Credit and Commerce International (BCCI). After several fraudulent practices were discovered, Khalid bin Salim bin Mahfouz was indicted on July 1, 1992, on

charges of participation in a Scheme to Defraud in the First Degree in violation of New York Penal Law § 190.65, in connection with certain of Defendant's acts and omissions relative to BCCI Holdings and certain related entities. The indictment alleges a series of misrepresentations, sham loans, and fraudulent conduct in failing to disclose the status of Defendant's interest in BCCI.

92. Under Khalid bin Salim bin Mahfouz, the BCCI was also implicated in supporting international terrorism, as reported by the United States Senate.

In the course of targeting BCCI for laundering drug money, the CIA learned of BCCI's involvement in manipulating certain financial markets, in arms trafficking, and in supporting international terrorism, including handling the finances of Sabri al-Bannah or Abu Nidal, and his terrorist organization.

93. The 1992 Senate investigative Report detailed the initial involvement of the BCCI in terrorism financial supporting terrorism:

BCCI's support of terrorism and arms trafficking developed out of several factors. First, as a principal financial institution for a number of Gulf sheikhdoms, with branches all over the world, it was a logical choice for terrorist organizations, who received payment at BCCI-London and other branches directly from Gulf-state patrons, and then transferred those funds wherever they wished without apparent scrutiny. Secondly, BCCI's flexibility regarding the falsification of documentation was helpful for such activities. Finally, to the extent that pragmatic considerations were not sufficient of themselves to recommend BCCI, the bank's pan-third world and pro-Islam ideology would have recommended it to Arab terrorist groups.

94. A bank audit of the National Commercial Bank conducted in 1998 revealed that over a 10 year period \$74 million dollars was funneled by its Zakat Committee to the International Islamic Relief Organization, headed by Osama bin Laden's brother-in-law.

95. The NCB audit report also stressed various irregularities due to "unreported expenses and loans." It states that "without knowledge of the Zakat Committee, NCB Directors established over the years credit and loans facilities for several charitable organizations, along with banking facilities that were not reviewed by the Committee." Direct donations were